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January 24, 2018

Mr. Wayne Kino Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, California 94105 Attn: Title V Reports

Six-month Deviation Summary and Six-month Monitoring Report Submittal by Chevron Richmond Refinery (Plant #0010) For the Period of June 1, 2017 to December 31, 2017

Dear Mr. Kino:

Attached are the Chevron Six-month Deviation Summary Report, and the Six-month Monitoring Report for June through December 2017, which meets the requirements of the Title V Permit Standard Condition I. F. and 40 CFR 70.6 as described in the BAAQMD correspondence from Steve Hill to Jim Whiteside dated January 8, 2004.

If you have any questions, please contact Mr. Carlos Perez at (510) 242-4405.

Sincerely,

Shawn Lee

Attachment

cc: First Name Last Name, Agency/Organization (via e-mail, w/ attach)

First Name Last Name, Agency/Organization (w/o attach)

Health, Environment & Safety Chevron Products Company P.O Box 1272 Richmond, CA 94802 – 0272 Tel 510 242 1400 Fax 510 242 5353 ShawnLee@chevron.com

Phone: (510) 242-3895	Title: Compliance Technician	Contact: Juliana, Robin W
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hmond	City: Richmond	City: Richmond
PO Box 1272	<u>PO</u>	841 Chevron Way
<u>1855</u>	Mailing Address	Facility Address:
		A0010 Chevron Richmond Refinery
	From 6/1/2017 to 12/31/2017	
nit y Report	BAAQMD Title V Permit 6 Month Deviation Summary Report	6

Title V deviations for the reporting period are summarized below:

contained in Table II A 3 (Grandfathered	Event Description: REVISED NOTIFICATION to reflect date & time change. The throughout limit for the Chevron Refinery I and Whatf of	Event Description: DEVISED NOTTEICATION to reflect date &	
Other:	Emission Point:	Discovered On: 1/10/2005	Di
AQMD:	Abatement Device :	Stopped: Ongoing Event	
Permit: Title V Permit, Table II.A.3	Source Number:	Event Started: 12/31/2004 11:59 PM	ш
May have resulted in a violation of :			

Event pescription: determine compliance with the annual throughput limits listed in Table II A 3, the District directed that Chevron sum the total throughput for each of the twelve months preceding the calculation date. Table II A 3 includes a 12-month throughput limit of 146,628,000 bbls for the sum of all 6 berths - S-9321, -9322, -9323, -9324, -9325 and -9326. As of January 1, 2005 the actual total throughput of these sources for the previous 12 months was approximately 148,340,000 bbls. Accordingly, based on data for the months, January 2004 through December 2004, on January 10, 2005 Chevron determined that these sources exceeded Sources) of the refinery's Title V permit are new limits -- they did not exist before December 1, 2003 (the date the refinery's Title V permit was issued). To

their annual throughput limit listed in Table II A 3 of the refinery's Title V permit.

Pursuant to Standard Condition I.J.2 of the refinery's Title V permit, Chevron is required to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only -- it is not an indication of non-compliance with the refinery's Title V permit.

Corrective actions or preventative steps taken: Probable Cause: The refinery has been operating at higher rates in order to meet the increased public demand for refined products, i.e., gasoline, diesel fuel and let fuel. The throughput capabilities refinery's feedstocks and incremental production are both handled at the Long Wharf. The 12-month throughput limit in the Title V Permit was artificially imposed and did not reflect the "as built" capabilities of the systems. No modifications have been made since February, 2000 that affected the wharf's

Chevron has reported this to the District as required by the Title V permit.

Event Description:	Discovered On:	Stopped:	Event Started: 7/1/2005		
REVISED: The throughput limit for the C	7/1/2005	✓ Ongoing Event			
Event Description: REVISED: The throughput limit for the Chevron Refinery Tank 1491 (S#1491) contained in Table II A 3 (Grandfathered Sources) of the Refinery's Title V	Emission Point:	Abatement Device :	Source Number: S1491	ï	
3 (Grandfathered Sources) of the Refinery's Title V	Other:	AQMD:	Permit: Title V permit, Table II A 3	May have resulted in a violation of :	

to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only - it is not an indication of non-compliance with the Refinery's Title V permit. throughput limit listed in Table II A 3 of the Refinery's Title V permit. Pursuant to Standard Condition I.J.2 of the Refinery's Title V permit, Chevron is required throughput limit of 1,093,160 bbls for 1491 Tank. As of July 31, 2006 the actual total throughput of this source for the previous 12 months was approximately permit are new limits - triey did not exist belore beceiliber 1, 2003 (trie date the reminery 5. Jule v permit was issued). Table 11 A 3 includes a 12-month .137.815 bbls. Accordingly, based on data for the months August 2005 through July 2006, Chevron determined that this source exceeded its annual

Corrective actions or preventative steps taken: Probable Cause: T-3073 received gasoline components from two process units and the refinery decided to divert one of these streams to T-1491 (S-1491). T-1491 has contained a number of gasoline components during its life. Although no change occurred with plant operation or capacity, the diverted stream caused an increase in throughput to be seen by T-1491. Immediately prior to its current service. T-1491 contained MTBE/TAME which was the basis for the Title V grandfathered. throughput limit. <u>made which affect T-1491's throughput capabilities and no modifications were made which enabled the change in service.</u> The throughput of the current process stream to T-1491 is much greater than the throughput of MTBE/TAME. No modifications have been

Chevron will continue to report this to the District as required by the Title V permit.

Discovered On: Event Started: Event Description: 11/23/2006 3:00 AM 12/4/2006 Ongoing Event Abatement Device : Source Number: Emission Point: S1688 May have resulted in a violation of : AOMD: Permit:

Title V Permit Table II.A.3

The throughput limits for T1688 contained in Table II A 3 (Grandfathered Sources) of the refinery's Title V permit are new limits -- they did not exist before December 1, 2003 (the date the refinery's Title V permit was issued). To determine compliance with the annual throughput limits listed in Table II A 3, the District directed that Chevron sum the total throughput for each of the twelve months preceding the calculation date. Table II A 3 includes an annual throughput limit listed in Table II A 3 of the refinery's Title V permit. Accordingly, based on data for the months December 2005 through November 2006, on December 1, 2006, Chevron determined that S-1688 exceded its annual broughput limit of 5,059,000 bbl. for S-1688. As of December 1, 2006 the actual throughput of S-1688 for the past 12 months was 5,206,861 bbl.

Pursuant to Standard Condition I.J.2 of the refinery's Title V permit, Chevron is required to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only -- it is not an indication of non-compliance with the refinery's Title V permit.

Corrective actions or Probable Cause: The grandfathered limit was established using the highest documented throughput for the tank which was not appropriate since design capacity would provide a higher throughput limit. This tank has not been part of any activity with NSR implications.

preventative steps taken: this permit condition. According to Standard Condition 1-2 of our Title V permit, this throughput limit is for reporting purposes only. We are reporting this exceedance consistent with

preventative steps taken:

this permit condition

According to Standard Condition J-2 of our Title V permit, this throughput limit is for reporting purposes only. We are reporting this exceedance consistent with

preventative steps taken:

this permit condition.

008	Ongoing Event	59 PM	
Emission Point:	Abatement Device :	Source Number: S3072	
Other:	AQMD:	Permit: Title V Permit Table II.A.3	May have resulted in a violation of:

Discovered On:

Event Started:

4/30/2008

Ħ

Stopped:

Event Description: The throughput limits for T3072 contained in Table II A 3 (Grandfathered Sources) of the refinery's Title V permit are new limits -- they did not exist before December 1, 2003 (the date the refinery's Title V permit was issued). To determine compliance with the annual throughput limits listed in Table II A 3, the District directed that Chevron sum the total throughput for each of the twelve months preceding the calculation date. Table II A 3 includes a nannual posterior of the twelve months preceding the calculation date. throughput limit of 2,979,200 bbl. for S-3072. As of April 30, 2008 the actual throughput of S-3072 for the past 12 months was 2,987,253 bbl. Accordingly,

Table II A 3 of the refinery's Title V permit.

based on data for the months May, 2007 through April 2008, on May 1, 2008, Chevron determined that S-3072 exceeded its annual throughput limit listed in

Probable Cause: The grandfathered limit was established using the highest documented throughput for the tank which was not appropriate since design capacity would provide a higher throughput limit. This tank has not been part of any activity with NSR implications. Pursuant to Standard Condition I.J.2 of the refinery's Title V permit, Chevron is required to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only -: it is not an indication of non-compliance with the refinery's Title V permit.

Corrective actions or preventative steps taken: According to Standard Condition 1-2 of our Title V permit, this throughput limit is for reporting purposed only. We are reporting this exceedance consistent with

Discovered On: Event Started: Stopped: 6/30/2008 7/7/2008 11:59 PM Ongoing Event

Abatement Device: Source Number: \$1504

Emission Point:

May have resulted in a violation of : AQMD: Permit:

Event Description: The throughput limits for T1504 contained in Table II A 3 (Grandfathered Sources) of the refinery's Title V permit are new limits -- they did not exist before December 1, 2003 (the date the refinery's Title V permit was issued). To determine compliance with the annual throughput limits listed in Table II A 3, the District directed that Chevron sum the total throughput for each of the twelve months preceding the calculation date. Table II A 3 includes an annual limit listed in Table II A 3 of the refinery's Title V permit Accordingly, based on data for the months of July 2007 through June 2008, on July 7, 2008, Chevron determined that S-1504 exceeded its annual throughput broughput limit of 602,132 bbls, for S-1504. As of June 30, 2008, the actual annual throughput limit of S-1504 for the past twelve months was 609,294 bbls.

Pursuant to Standard Condition J.2 of the refinery's Tile V permit, Chevron is required to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only -- it is not an indication of non-compliance with the refinery's Title V permit.

Corrective actions or Probable Cause: The grandfathered limit was established using the highest documented throughput for the tank which was not appropriate since design capacity would provide a higher throughput limit. This tank has not been part of any activity with NSR implications.

According to Standard Condition 1-2 of our Title V permit, this throughput limit is for reporting purposes only. We are reporting this exceedance consistent with

Event Description: The ti	Discovered On: 2/3/2009	Stopped:	Event Started: 1/31/2009 11:59 PM	
roughput limits for T-1491 contained	009	✓ Ongoing Event	59 PM	
Event Description: The throughput limits for T-1491 contained in Table II A 3 (Grandfathered Sources) of the refinery's Title V permit ar	Emission Point:	Abatement Device :	Source Number: S1491	
Ttle V permit are new limits - they did not exist before	Other:	AQMD:	Permit: Title V Permit Table II.A.3	May have resulted in a violation of:

December 1, 2003 (the date the refinery's Title V permit was issued). To determine compliance with the annual throughput limits listed in Table II A 3, the District directed that Chevron sum the total throughput for each of the twelve months preceding the calculation date. Table II A 3 includes an annual throughput limit of 1,093,160 bbls. For S-1491. As of January 31, 2009, the actual throughput limit of 1,093,160 bbls. For S-1491. As of January 31, 2009, the actual throughput of S-1491 for the past 12 months was 1,119,918 bbls. Accordingly, based on data for the months of February 2008 through January 2009, on February 3, 2009, Chevron determined that S-1491 exceeded its annual

Pursuant to Standard Condition 1.2 of the refinery's Title V permit, Chevron is required to report to the District any exceedance of a limit in Table II A 3. Such notice is for reporting purposes only - it is not an indication of non-compliance with the refinery's Title V permit.

throughput limit in Table II A 3 of the refinery's Title V permit.

Corrective actions or Probable Cause: The grandfathered limit was established using the highest documented throughput for the tank which was not appropriate since design capacity would provide a higher throughput limit. This tank has not been part of any activity with NSR implications

preventative steps taken: According to Standard Condition J-2 of our Title V permit, this limit is for reporting purposes only. We are reporting this exceedance consistent with this permit condition. ****Already in system. ****

Event Description	Discovered On:	Stopped:	Event Started: 5/20/2016 7:00 AM	
n: Beginning on Ma	5/23/2016		016 7:00 AM	
y 20, 2016 the FCC electr		Ongoing Event		
ostatic precipitato		Aba		
Event Description: Beginning on May 20, 2016 the FCC electrostatic precipitator (ESP) has begun operating intermittently in a state of c	Emission Point:	Abatement Device: A0014	Source Number: S4285	
termittently in a stat				
te of deviation with Title V permit condition	Other:	AQMD:	Permit: PC #11066 part 7A5	May have resulted in a violation of:

submitted to capture all potential deviations with the above mentioned permit condition as a result of implementing the testing protocol. 11066 part 7(A5) following the commencement of the Refinery's ammonia optimization and demonstration testing protocol per Regulation 6 Rule 5. Per the Air District's approval and direction given on April 12, 2016, the test protocol is conducted under the Air District's Trial Testing Policy and this report is being

UPDATE:
On June 27, 2017, the BAAQMD agreed to allow the Chevron Richmond Refinery to continue trial testing under the Refinery's Ammonia Optimization and Demonstration Testing Protocol. Per the agreement, the BAAAQMD will extend enforcement relief and permit the Refinery to operate outside the requirements of the Title V Permit Condition 11066 #3A, 3B, 3C, 7A, and 7AS (and potentially other parts of the permit condition not in the final ammonia. emissions limit. The Refinery will continue to capture all potential deviations as a result of implementing the testing protocol.

Probable Cause:

Corrective actions or Due to the ongoing FCC stack ammonia optimization testing protocol, the Refinery deviated from BAAQMD permit condition #11066 part 7A5 on the following dates.

preventative steps taken:

May:

•May 20, 2016 at 0700 hrs to May 21, 2016 at 0300 hrs
•May 21, 2016 at 0600 hrs to May 23, 2016 at 0700 hrs

•May 21, 2016 at 0600 hrs to May 26, 2016 at 00:00 hrs •May 26, 2016 at 18:00 hrs to May 27, 2016 at 00:00 hrs
•May 27, 2016 at 08:00 hrs to May 27, 2016 at 10:00 hrs
•May 28, 2016 at 09:00 hrs to May 28, 2016 at 11:00 hrs
•May 28, 2016 at 21:00 hrs to May 28, 2016 at 22:00 hrs
•May 31, 2016 at 21:00 hrs to May 31, 2016 at 22:00 hrs

June 15, 2016 at 22:00 hrs to June 15, 2016 at 23:00 hrs
June 16, 2016 at 09:00 hrs to June 17, 2016 at 08:00 hrs
June 17, 2016 at 20:00 hrs to June 18, 2016 at 09:00 hrs
June 18, 2016 at 20:00 hrs to June 19, 2016 at 10:00 hrs
June 18, 2016 at 17:00 hrs to June 25, 2016 at 11:00 hrs
June 20, 2016 at 17:00 hrs to June 26, 2016 at 11:00 hrs
June 25, 2016 at 20:00 hrs to June 26, 2016 at 21:00 hrs
June 26, 2016 at 18:00 hrs to June 26, 2016 at 21:00 hrs
June 27, 2016 at 03:00 hrs to June 27, 2016 at 04:00 hrs
June 27, 2016 at 05:00 hrs to June 27, 2016 at 11:00 hrs
June 28, 2016 at 05:00 hrs to June 28, 2016 at 11:00 hrs
June 28, 2016 at 05:00 hrs to June 28, 2016 at 08:00 hrs June 10, 2016 at 20:00 hrs to June 10, 2016 at 21:00 hrs June 6, 2016 at 10:00 hrs to June 6, 2016 at 14:00 hrs June 29, 2016 at 19:00 hrs to June 30, 2016 at 12:00 hrs June 28, 2016 at 20:00 hrs to June 29, 2016 at 02:00 hrs June 15, 2016 at 12:00 hrs to June 15, 2016 at 19:00 hrs June 15, 2016 at 07:00 hrs to June 15, 2016 at 08:00 hrs June 14, 2016 at 22:00 hrs to June 15, 2016 at 01:00 hrs

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•July 2, 2016 at 09:00 hrs to July 2, 2016 at 10:00 hrs
•July 3, 2016 at 02:00 hrs to July 3, 2016 at 15:00 hrs
•July 4, 2016 at 08:00 hrs to July 4, 2016 at 16:00 hrs
•July 4, 2016 at 22:00 hrs to July 5, 2016 at 09:00 hrs
•July 5, 2016 at 00:00 hrs to July 5, 2016 at 09:00 hrs
•July 5, 2016 at 00:00 hrs to July 6, 2016 at 15:00 hrs
•July 6, 2016 at 18:00 hrs to July 7, 2016 at 00:00 hrs
•July 7, 2016 at 10:00 hrs to July 7, 2016 at 08:00 hrs
•July 7, 2016 at 00:00 hrs to July 7, 2016 at 13:00 hrs <u>July:</u>
•July 1, 2016 at 00:00 hrs to July 1, 2016 at 02:00 hrs

•August 16, 2016 at 23:00 hrs to August 17, 2016 at 00:00 hrs
•August 17, 2016 at 22:00 hrs to August 18, 2016 at 10:00 hrs
•August 22, 2016 at 11:00 hrs to August 18, 2016 at 13:00 hrs
•August 23, 2016 at 20:00 hrs to August 23, 2016 at 21:00 hrs
•August 26, 2016 at 20:00 hrs to August 26, 2016 at 21:00 hrs
•August 26, 2016 at 20:00 hrs to August 26, 2016 at 21:00 hrs
•August 26, 2016 at 20:00 hrs to August 26, 2016 at 21:00 hrs
•August 29, 2016 at 09:00 hrs to August 29, 2016 at 12:00 hrs
•August 29, 2016 at 13:00 hrs to August 29, 2016 at 13:00 hrs
•August 30, 2016 at 17:00 hrs to August 29, 2016 at 23:00 hrs August 31, 2016 at 07:00 hrs to Septembe 1, 2016 at 00:00 hrs August 12, 2016 at 21:00 hrs to August 12,2016 at 22:00 hrs August 8, 2016 at 12:00 hrs to August 8, 2016 at 16:00 hrs August 5, 2016 at 10:00 hrs to August 5, 2016 at 14:00 hrs August 5, 2016 at 06:00 hrs to August 5, 2016 at 07:00 hrs

•September 3, 2016 at 17:00 hrs to September 5, 2016 at 21:00 hrs
•September 6, 2016 at 03:00 hrs to September 7, 2016 at 20:00 hrs
•September 8, 2016 at 06:00 hrs to September 8, 2016 at 21:00 hrs
•September 9, 2016 at 00:00 hrs to September 9, 2016 at 17:00 hrs
•September 9, 2016 at 00:00 hrs to September 10, 2016 at 17:00 hrs
•September 10, 2016 at 00:00 hrs to September 10, 2016 at 17:00 hrs
•September 18, 2016 at 02:00 hrs to September 18, 2016 at 15:00 hrs
•September 20, 2016 at 20:00 hrs to September 20, 2016 at 15:00 hrs
•September 20, 2016 at 20:00 hrs to September 24, 2016 at 00:00 hrs
•September 21, 2016 at 20:00 hrs to September 24, 2016 at 00:00 hrs
•September 24, 2016 at 03:00 hrs to September 25, 2016 at 16:00 hrs
•September 26, 2016 at 03:00 hrs to September 27, 2016 at 16:00 hrs
•September 27, 2016 at 19:00 hrs to September 30, 2016 at 10:00 hrs
•September 27, 2016 at 19:00 hrs to September 30, 2016 at 10:00 hrs September 1, 2016 at 00:00 hrs to September 1, 2016 at 02:00 hrs
 September 1, 2016 at 03:00 hrs to September 1, 2016 at 07:00 hrs
 September 1, 2016 at 08:00 hrs to September 1, 2016 at 22:00 hrs September 30, 2016 at 16:00 hrs to October 1, 2016 at 00:00 hrs

October:

October 1, October 1, 2016 at 00:00 hrs to October 4, 2016 at 22:00 hrs
October 4, 2016 at 23:00 hrs to October 7, 2016 at 21:00 hrs
October 8, 2016 at 05:00 hrs to October 13, 2016 at 19:00 hrs
October 13, 2016 at 23:00 hrs to October 15, 2016 at 07:00 hrs
October 15, 2016 at 09:00 hrs to October 17, 2016 at 01:00 hrs October 17, 2016 at 09:00 hrs to October 21, 2016 at 18:00 hrs

•October 23, 2016 at 10:00 hrs to October 24, 2016 at 20:00 hrs
•October 24, 2016 at 22:00 hrs to October 25, 2016 at 20:00 hrs
•October 25, 2016 at 22:00 hrs to October 26, 2016 at 19:00 hrs
•October 25, 2016 at 21:00 hrs to October 30, 2016 at 00:00 hrs
•October 26, 2016 at 21:00 hrs to October 30, 2016 at 19:00 hrs October 23, 2016 at 00:00 hrs to October 23, 2016 at 06:00 hrs October 22, 2016 at 00:00 hrs to October 22, 2016 at 21:00 hrs

November:

 November 1, 2016 at 03:00 hours to November 2, 2016 at 10:00 hours
 November 2, 2016 at 13:00 hours to November 11, 2016 at 19:00 hours
 November 11, 2016 at 20:00 hours to November 22, 2016 at 09:00 hours November 22, 2016 at 19:00 hours to December 1, 2016 at 00:00 hours

December:

•December 8, 2016 at 07:00 hrs to December 9, 2016 at 16:00 hrs
•December 10, 2016 at 00:00 hrs to December 10, 2016 at 17:00 hrs
•December 10, 2016 at 20:00 hrs to December 16, 2016 at 07:00 hrs
•December 16, 2016 at 08:00 hrs to December 18, 2016 at 02:00 hrs
•December 18, 2016 at 05:00 hrs to January 1, 2016 at 00:00 hrs December 1, 2016 at 00:00 hrs to December 6, 2016 at 08:00 hrs
 December 6, 2016 at 10:00 hrs to December 7, 2016 at 08:00 hrs
 December 7, 2016 at 10:00 hrs to December 7, 2016 at 22:00 hrs

January 2017:

•January 1, 2017 at 00:00 hours to January 26, 2017 at 20:00 hours

•January 27, 2017 at 00:00 hours to January 31, 2017 at 16:00 hours

•January 31, 2017 at 16:00 hours

•January 31, 2017 at 16:00 hours January 31, 2017 at 19:00 hours to February 1, 2017 at 00:00 hours

February 2017:

•February 27, 2017 at 00:00 hours to February 28, 2017 at 23:00 hours February 1, 2017 at 00:00 hours to February 26, 2017 at 19:00 hours

•March 10, 2017 at 06:00 hours to March 10, 2017 at 22:00
•March 11, 2017 at 00:00 hours to March 25, 2017 at 05:00
•March 25, 2017 at 10:00 hours to March 25, 2017 at 12:00
•March 25, 2017 at 15:00 hours to March 25, 2017 at 16:00
•March 25, 2017 at 19:00 hours to March 26, 2017 at 01:00 March 1, 2017 at 00:00 hours to March 2, 2017 at 01:00
 March 2, 2017 at 06:00 hours to March 4, 2017 at 13:00
 March 4, 2017 at 15:00 hours to March 10, 2017 at 00:00 March 26, 2017 at 10:00 hours to March 26, 2017 at 11:00 March 28, 2017 at 18:00 hours to March 31, 2017 at 22:00 March 26, 2017 at 12:00 hours to March 26, 2017 at 15:00 March 26, 2017 at 21:00 hours to March 28, 2017 at 17:00

•April 1, 2017 at 00:00 hours to April 1, 2017 at 03:00 •April 1, 2017 at 07:00 hours to April 1, 2017 at 20:00 •April 1, 2017 at 22:00 hours to April 2, 2017 at 21:00 •April 3, 2017 at 01:00 hours to April 3, 2017 at 18:00 April 4, 2017 at 09:00 hours to April 6, 2017 at 16:00

•April 10, 2017 at 01:00 hours to April 10, 2017 at 18:00
•April 10, 2017 at 22:00 hours to April 13, 2017 at 22:00
•April 14, 2017 at 22:00 hours to April 14, 2017 at 20:00
•April 15, 2017 at 04:00 hours to April 16, 2017 at 11:00
•April 15, 2017 at 10:00 hours to April 19, 2017 at 16:00
•April 19, 2017 at 14:00 hours to April 20, 2017 at 09:00
•April 20, 2017 at 10:00 hours to April 24, 2017 at 06:00
•April 20, 2017 at 10:00 hours to April 27, 2017 at 18:00
•April 24, 2017 at 20:00 hours to April 27, 2017 at 11:00
•April 27, 2017 at 20:00 hours to April 27, 2017 at 11:00
•April 27, 2017 at 20:00 hours to April 27, 2017 at 21:00 April 29, 2017 at 23:00 hours to May 1, 2017 at 00:00 April 6, 2017 at 19:00 hours to April 9, 2017 at 22:00

•May 17, 2017 at 22:00 hours to May 19, 2017 at 04:00
•May 19, 2017 at 07:00 hours to May 19, 2017 at 20:00
•May 19, 2017 at 21:00 hours to May 21, 2017 at 18:00
•May 21, 2017 at 21:00 hours to May 21, 2017 at 18:00
•May 21, 2017 at 21:00 hours to May 27, 2017 at 05:00
•May 23, 2017 at 13:00 hours to May 29, 2017 at 01:00
•May 27, 2017 at 13:00 hours to May 29, 2017 at 18:00
•May 29, 2017 at 13:00 hours to May 29, 2017 at 18:00 •May 17, 2017 at 08:00 hours to May 17, 2017 at 11:00 •May 10, 2017 at 14:00 hours to May 10, 2017 at 21:00
•May 12, 2017 at 10:00 hours to May 13, 2017 at 18:00
•May 13, 2017 at 21:00 hours to May 16, 2017 at 00:00
•May 16, 2017 at 10:00 hours to May 16, 2017 at 14:00
•May 16, 2017 at 18:00 hours to May 17, 2017 at 16:00 •May 1, 2017 at 00:00 hours to May 7, 2017 at 19:00 •May 7, 2017 at 23:00 hours to May 9, 2017 at 19:00 •May 9, 2017 at 22:00 hours to May 10, 2017 at 13:00 May 30, 2017 at 10:00 hours to June 1, 2017 at 00:00

June 13, 2017 at 16:00 hours to June 17, 2017 at 01:00

June 17, 2017 at 12:00 hours to June 18, 2017 at 06:00

June 18, 2017 at 13:00 hours to June 19, 2017 at 12:00

June 18, 2017 at 13:00 hours to June 29, 2017 at 18:00

June 23, 2017 at 22:00 hours to June 24, 2017 at 18:00

June 24, 2017 at 20:00 hours to June 26, 2017 at 02:00

TR sets were shutdown from June 24, 2017 2015 hours to June 25, 2017 2050 hours; RCA # 07D72

June 26, 2017 at 16:00 hours to June 27, 2017 at 12:00

June 27, 2017 at 16:00 hours to June 27, 2017 at 13:00

June 28, 2017 at 16:00 hours to June 27, 2017 at 13:00 June 12, 2017 at 13:00 hours to June 13, 2017 at 07:00 June 3, 2017 at 00:00 hours to June 12, 2017 at 11:00 June 2017

•June 1, 2017 at 00:00 hours to June 2, 2017 at 20:00

June 28, 2017 at 01:00 hours to July 1, 2017 at 00:00

July 1, 2017 at 00:00 hours to July 7, 2017 at 22:00 hours

July 8, 2017 at 07:00 hours to July 8, 2017 at 09:00 hours

July 8, 2017 at 21:00 hours to July 9, 2017 at 23:00 hours

July 10, 2017 at 00:00 hours to July 10, 2017 at 15:00 hours

July 10, 2017 at 18:00 hours to July 12, 2017 at 12:00 hours

July 21, 2017 at 12:00 hours to July 22, 2017 at 23:00 hours

July 23, 2017 at 14:00 hours to July 23, 2017 at 17:00 hours

July 24, 2017 at 02:00 hours to July 24, 2017 at 17:00 hours

July 24, 2017 at 11:00 hours to July 24, 2017 at 13:00 hours

July 24, 2017 at 16:00 hours to July 24, 2017 at 20:00 hours

July 25, 2017 at 07:00 hours to July 25, 2017 at 20:00 hours

July 25, 2017 at 12:00 hours to July 25, 2017 at 23:00 hours

July 26, 2017 at 15:00 hours to July 29, 2017 at 23:00 hours

July 26, 2017 at 15:00 hours to July 29, 2017 at 20:00 hours •July 12, 2017 at 14:00 hours to July 12, 2017 at 22:00 hours
•July 13, 2017 at 03:00 hours to July 14, 2017 at 00:00 hours
•July 14, 2017 at 10:00 hours to July 15, 2017 at 00:00 hours
•July 15, 2017 at 10:00 hours to July 15, 2017 at 20:00 hours
•July 15, 2017 at 00:00 hours to July 16, 2017 at 2:00 hours
•July 16, 2017 at 08:00 hours to July 16, 2017 at 23:00 hours
•July 16, 2017 at 14:00 hours to July 16, 2017 at 23:00 hours
•July 17, 2017 at 04:00 hours to July 17, 2017 at 11:00 hours
•July 18, 2017 at 01:00 hours to July 19, 2017 at 23:00 hours
•July 18, 2017 at 01:00 hours to July 19, 2017 at 23:00 hours July 29, 2017 at 15:00 hours to August 1, 2017 at 00:00 hours July 20, 2017 at 13:00 hours to July 21, 2017 at 02:00 hours

August 1, 2017 at 00:00 hours to August 1, 2017 at 17:00

•August 1, 2017 at 22:00 hours to August 2, 2017 at 15:00

•August 2, 2017 at 18:00 hours to August 3, 2017 at 13:00

•August 3, 2017 at 15:00 hours to August 4, 2017 at 02:00

•August 4, 2017 at 07:00 hours to August 4, 2017 at 07:00

•August 6, 2017 at 14:00 hours to August 13, 2017 at 18:00

•August 13, 2017 at 23:00 hours to August 14, 2017 at 21:00

•August 15, 2017 at 07:00 hours to August 15, 2017 at 19:00

•August 15, 2017 at 23:00 hours to August 15, 2017 at 19:00 •August 15, 2017 at 23:00 hours to August 17, 2017 at 21:00
•August 18, 2017 at 01:00 hours to August 20, 2017 at 16:00
•August 18, 2017 at 19:00 hours to August 20, 2017 at 21:00
•August 20, 2017 at 19:00 hours to August 20, 2017 at 21:00
•August 21, 2017 at 00:00 hours to August 21, 2017 at 22:00
•August 22, 2017 at 01:00 hours to August 22, 2017 at 12:00
•August 22, 2017 at 14:00 hours to August 22, 2017 at 19:00 •August 22, 2017 at 14:00 hours to August 22, 2017 at 19:00
•August 23, 2017 at 02:00 hours to August 24, 2017 at 16:00
•August 24, 2017 at 20:00 hours to August 24, 2017 at 21:00
•August 26, 2017 at 07:00 hours to August 27, 2017 at 05:00

•September 18, 2017 at 20:00 hours to September 19, 2017 at 05:00 hours september 19, 2017 at 07:00 hours to September 19, 2017 at 14:00 hours september 19, 2017 at 19:00 hours to September 19, 2017 at 22:00 hours september 22, 2017 at 19:00 hours to September 22, 2017 at 16:00 hours september 22, 2017 at 18:00 hours september 26, 2017 at 18:00 hours september 27, 2017 at 18:00 hours september 27, 2017 at 10:00 hours september 27, 2017 at 10:00 hours september 27, 2017 at 10:00 hours september 27, 2017 at 21:00 <u>September 14, 2017 at 07:00 hours to September 14, 2017 at 10:00 hours</u>
 <u>September 14, 2017 at 12:00 hours to September 14, 2017 at 14:00 hours</u>
 <u>September 16, 2017 at 22:00 hours to September 17, 2017 at 01:00 hours</u> September 18, 2017 at 08:00 hours to September 18, 2017 at 10:00 hours September 17, 2017 at 19:00 hours to September 17, 2017 at 22:00 hours September 28, 2017 at 09:00 hours to September 28, 2017 at 10:00 hours

<u>September 30, 2017 at 09:00 hours to September 30, 2017 at 11:00 hours</u>
 <u>September 30, 2017 at 21:00 hours to September 30, 2017 at 23:00 hours</u>

October 2, 2017 at 11:00 hours to October 2, 2017 at 12:00 hours

•October 2, 2017 at 20:00 hours to October 3, 2017 at 02:00 hours

•October 6, 2017 at 10:00 hours to October 6, 2017 at 11:00 hours

•October 6, 2017 at 10:00 hours to October 6, 2017 at 13:00 hours

•October 6, 2017 at 10:00 hours to October 7, 2017 at 16:00 hours

•October 7, 2017 at 03:00 hours to October 7, 2017 at 16:00 hours

•October 7, 2017 at 00:00 hours to October 9, 2017 at 02:00 hours

•October 9, 2017 at 00:00 hours to October 9, 2017 at 00:00 hours

•October 9, 2017 at 00:00 hours to October 10, 2017 at 10:00 hours

•October 10, 2017 at 00:00 hours to October 10, 2017 at 10:00 hours

•October 11, 2017 at 20:00 hours to October 10, 2017 at 11:00 hours

•October 11, 2017 at 20:00 hours to October 12, 2017 at 11:00 hours

•October 11, 2017 at 12:00 hours to October 12, 2017 at 11:00 hours

•October 12, 2017 at 14:00 hours to October 13, 2017 at 11:00 hours

•October 14, 2017 at 11:00 hours to October 13, 2017 at 11:00 hours

•October 14, 2017 at 11:00 hours to October 13, 2017 at 12:00 hours

•October 14, 2017 at 11:00 hours to October 13, 2017 at 12:00 hours

•October 14, 2017 at 11:00 hours to October 13, 2017 at 12:00 hours

•October 14, 2017 at 11:00 hours to October 13, 2017 at 12:00 hours

•October 14, 2017 at 15:00 hours to October 14, 2017 at 17:00 hours

•October 30, 2017 at 15:00 hours to October 30, 2017 at 17:00 hours

•October 30, 2017 at 15:00 hours to October 30, 2017 at 17:00 hours

None November 2017

December 2017

FCC NH3 Optimization, Reg 6-5, trial testing is being conducted and still ongoing.

Event Description	Discovered On:	Stopped:	Event Started: 1/17/2017 9:07 AM	
n: On January 17, 2	1/17/2017		2017 9:07 AM	
2017 from 0907 hours to 1		Ongoing Event	·	
1421 hours, the		AŁ		
Event Description: On January 17, 2017 from 0907 hours to 1421 hours, the FCC (S-4285) operated above its limit of 20% opacity for a consecutive 3-hour period. This indicated excess occurred during the Refinery's (BAAOMD 6-5) Ammonia Optimization and Demonstration Testing Protocol. Per the agreement made on April 17, 2016	Emission Point:	Abatement Device :	Source Number: S4285	
% opacity for a c				
onsecutive 3-hour period. This indicated he agreement made on April 12 2016	Other: 40 CFR 63.1564	AQMD:	Permit:	May have resulted in a violation of:

between the Refinery and the BAAQMD, the test protocol is conducted under the Air District's Trial Testing Policy and this notification is being submitted to capture all potential deviations as a result of implementing the testing protocol.

On June 27, 2017, the BAAQMD agreed to allow the Chevron Richmond Refinery to continue trial testing under the Refinery's Ammonia Optimization and Demonstration Testing Protocol. Per the agreement, the BAAQMD will extend enforcement relief and permit the Refinery to operate outside the requirements of the Title V Permit Condition 11066 #3A, 3B, 3C, 7A, and 7AS (and potentially other parts of the permit condition) until issuance of the final ammonia

<u>emissions limit. The Refinery will continue to capture all potential deviations as a result of implementing the testing protocol.</u>

Probable Cause: Due to the ongoing FCC stack ammonia optimization testing protocol, the Refinery deviated from 40 CFR 63.1564 on the following dates.

preventative steps taken:

Corrective actions or

January 2017

•January 17, 2017 from 0907 hours to 1421 hours

February 2017

None

March 2017
•None

April 2017

•None

May 2017

•None

None

June 2017

July 2017 None

None August 2017

September 2017

None

•None October 2017

November 2017

None

December 2017
•None

ECC NH3 Optimization, Regulation 6-5, trial testing is being conducted and still ongoing.

Permit: #469	Permit: #469	200
Permit: #469 Part 6 subpart E2	Permit: #469 Part 6 subpart E2 and E3	

Discovered On: Event Started: 12/20/2016 3/21/2017 Ongoing Event

On March 21, 2017, furnace F-1650 (S-4349) was discovered to potentially be operating above its required 3-hr average NOx limit of 20 ppmv corrected to 3% **Emission Point:**

Abatement Device : Source Number:

Event Description: O2, and its 8-hr average CO limit of 50 ppmv corrected to 3% O2 as specified in Title V Permit Condition #469 Part 6 Subpart E2 and E3. Chevron is submittin <u>1349) as soon as feasible, subject to source test contractor availability and District notification requirements</u> his 10-day deviation in abundance of caution and efforts to decrease NOx and CO are underway, Additionally, Chevron is scheduling a source test for F-1650 (S-

preventative steps taken:

Probable Cause: Chevron undertook a source test on April 7, 2017, with results of 12.7 ppmv CO corrected to 3% O2 and 39.5 ppmv NOx corrected to 3% O2. The furnace is <u>operating at approximately one-third of fired duty when compared to operation prior to turnaround activity.</u>

the turnaround, the Vacuum Stripper Feed Furnace, F-1650 (S-4349), which heats the feed to C-1650 has to operate at lower firing rates, which results in a the 2016 4th Quarter RLOP Major Turnaround repairs were made to damaged internals of the Vacuum Stripper, C-1650, located in the HNF Plant. To maintain the mechanical integrity of C-1650, the facility implemented a replacement of the column's packing and liquid distributor, and installed a steam sparger. After The purpose of the Heavy Neutral Hydrofinisher (HNF) Plant (S-4343) is to Isodewax and Hydrofinish waxy oils to produce finished lube oil base stocks. During

working hours, to address the NOx and CO concentrations. Several recently-taken readings indicate concentration levels within limits but Chevron desires to ensure that operation under anticipated long-term operating scenarios will be consistently within the concentration limits. The company is going to be contacting After discovery of the potential for increased NOx and CO concentrations noted above, Chevron undertook immediate steps, including support outside of normal <u>confirm the readings it has been taking.</u> the District to discuss corrective actions and the best path forward to address these complex technical issues. The company is also scheduling a source test to

Chevron undertook an additional source test on May 3, 2017 to validate if the preliminary mitigation efforts could sustain reductions in NOx and CO while operating at the current lower firing duty. The efforts included but were not limited to, installation of burner block plates, sealing of out of service burners and adjustments to stack damper and air registers. Despite the initial troubleshooting activities, F-1650 continues to operate with elevated CO and NOx (as NO2). potential to emit of F-1650, calculated based on the permitted firing rate and concentration limits. when compared to concentrations prior to the 2016 RLOP Major Turnaround. Nevertheless, both NOx and CO mass emissions are below the corresponding

and develop a compliance plan and schedule that could be memorialized in a Compliance and Settlement Agreement. Chevron has developed a project team to Chevron met with the Air District Inspector on May 16, 2017 to discuss its continued efforts to address the increased NOx and CO concentrations from F-1650. <u>continues to communicate with the District about memorializing the approach to achieving resolution in an agreement</u> while also meeting the operational standards for the process over the long term. As Chevron moves forward on steps to resolve the deviations, the company evaluate several long-term solutions, including among others, addressing burner design, catalyst, and tube insulation that could potentially resolve the situation,

an approved Compliance and Settlement agreement version resubmitted on June 9, 2017. Chevron continues to work toward a resolution of the deviations, and continues to communicate with the District to attain lareement. Following discussions at that meeting, several requested changes have been made to the Compliance and Settlement Agreement and an updated Chevron met with Air District Inspector Quentin Malloy, and Supervisor Ron Pilkington on May 25, 2017 to review the proposed Compliance and Settlement

deviations and is closely monitoring F-1650 to ensure optimized operation Discussions with the Air District are ongoing working toward a Compliance and Settlement agreement. Chevron continues to work toward a resolution of the

A Compliance and Settlement agreement between Chevron and the Air District was attained on August 1, 2017.

As outlined in the C&E agreement attained August 1, 2017 a case study was completed on August 15, 2017 and a selection of a proposed option was chosen by the September 15, 2017 due date

Per the Compliance and Settlement Agreement and the Action Plan due date change email from District legal counsel Adan Schwartz, the Action Plan has been submitted on October 20th, 2017. Field testing of the alternate burner tips is ongoing.

C&E agreement termination letter received October 20, 2017.

Variance submitted on October 27, 2017.

November 3, 2017 - Met with Air District to discuss Termination letter and review progress to date.

November 13, 2017 - BAAQMD site visit to tour furnace F-1650

November 16, 2017 - BAAQMD meeting to review data and discuss path forward

All three F-1650 alternate burner tips were removed and replaced with original burner tips the week of October 30, 2017.

Permit to Operate was issued on January 17, 2018 by Bay Area Air Quality Engineering Manager,

A Compliance and Settlement agreement between Chevron and the Air District was attained on January 18, 2018

Event Description: On June 6th, 2017 flaring occurred at the F	Discovered On: 6/6/2017	Stopped: 6/6/2017 3:39 PM Ongoing Event	Event Started: 6/6/2017 2:50 PM	
Event Description: On June 6th, 2017 flaring occurred at the FCC flare (5-6016) and RLOP flare (5-6039) when relief system flows exceeded	Emission Point:	Abatement Device :	Source Number: S6016	
lows exceeded the capacity of the in service flare gas	Other: 40 CFR Subpart J (60.104(a)(1	AQMD:	Permit:	May have resulted in a violation of :

Probable Cause: recovery compressor, K-1060. The flaring deviated from 40 CFR 60 Subpart J (60.104(a)(1)) because it was not due to a startup, shutdown, or malfunction, and the vent gas did not have a hydrogen sulfide concentration below 230 mg/dscm (0.10 gr/dscf).

Corrective actions or preventative steps taken: On June 2, 2017, K-1060 one of the two flare gas recovery compressors, was taken out of service for necessary repairs due to hot discharge temperatures. K-1060 repairs were expedited on a "break-in" priority, and the compressor was returned to service on June 9, 2017. During this time, on June 6th, 2017, increased flow to the relief system through V-705 exceeded the capacity of the one in-service compressor, K-1070, and the flaring incident occurred. If the K-1060 malifunction would not have occurred, with both compressors in service, the relief flows would have been within their recovery capacity and there would not have been flaring. An extensive investigation of the incident has not been able to identify the specific source of increased flow to V-705.

K-1060 repairs were expedited and the compressor was returned to service June 9, 2017. The investigation is ongoing to identify the specific source that led to

Event Description:	Event Started: 6/24/2017 8:00 PM Stopped: 6/25/2017 11:59 PM Discovered On: 6/24/2017
Subsequent to an unexpected Precipitator (ESP) required an	17 8:00 PM
shutdown of the Refinery's Femergency shutdown at app	
Event Description: Subsequent to an unexpected shutdown of the Refinery's Fluid Catalytic Cracking (FCC) unit (S-4285) on June 24, 2017 at 19:30 hours, the FCC's Electrostatic Precipitator (ESP) required an emergency shutdown at approximately 20:15 hours. As a result, the ESP was operating with greater than 2 TR sets below	Source Number: 54285 Abatement Device: A0014 Emission Point:
une 24, 2017 as operating v	
at 19:30 hours, the FCC's Electrostatic with greater than 2 TR sets below	May have resulted in a violation of : Permit: Title V PC 11066 (7)(a5) AQMD:

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preventative steps taken: Corrective actions or Probable Cause: On June 24, 2017 Operations was in the process of warming up C-90 Main Fractionator Bottoms, P-105. Subsequent to opening the suction manual block valve on P-105, flow was lost on all three of the Main Fractionator Bottoms pumps P-105/A/B. Operations was unable to re-establish flow and the level in C-90 continued to rise. Once the level in C-90 reached 80%, and to avoid a complete trip of the plant, feed was pulled from the unit at approximately 1930 hours. To address any potential hydrocarbon, carry over into the Electrostatic Precipitator (ESP) the TR sets were immediately de-energized at 2015 hours. This is a Chevron Best Practice to avoid a potential unsafe atmosphere in the ESP that could potentially be ignited by an electrical spark. Feed was introduced back into the unit on June 25, 2017 at 1050 hours and the TR sets were placed back in service on June 25, 2017 at 2050 hours. 200mA and with the remaining TR sets averaged less than296mA over a 3-hr period. This occurred from the 2000 hour on June 24, 2017 through the 2300 hour on June 25, 2017. The TR sets were de-energized as required per process safety best practices.

The TR sets were placed back in service on June 25, 2017 at approximately 2050 hours.

Event Started: Stopped: 6/28/2017 3:06 PM 6/28/2017 3:08 PM 6/28/2017 Ongoing Event Source Number: Emission Point: S6016 May have resulted in a violation of : Other: 40 CFR Subpart J (60.104(a)(1 Permit:

Event Description: On June 28th, 2017 flaring occurred at the FCC Flare (S-6016), NISO Flare (S-6013), and SISO flare
(S-6012) when relief system flows exceeded the capacity of flare gas recovery resulting in visible flaring. The flaring deviated from 40 CFR 60 Subpart J
(60.104(a)(1)) because it was not due to a startup, shutdown, or malfunction, and the vent gas did not have a hydrogen sulfide concentration below 230 <u>mg/dscm (0.10gr/dscf).</u>

Corrective actions or preventative steps taken: Probable Cause: Relief system flows momentarily exceeded the capacity of the Flare Gas Recovery Compressor resulting in visible flaring. An extensive review of process trends during the investigation identified that the flow to the relief system came through V-705, but the originating source of flow has not been definitively identified.

Operations immediately responded to identify the source and optimize the flare gas compressor operations. The investigation is ongoing to identify the source that led to the flaring.

1 hours when relief system flows exceeded the 104(a)(1)) because it was not due to a startup.	Event Description: On June 28th, 2017 flaring occurred at the FCC Flare (S-6016) from approximately 2000 hours through 2001 hours wh capacity of flare gas recovery resulting in visible flaring. The flaring deviated from 40 CFR 60 Subpart J (60.104(a)(1)) shutdown, or malfunction, and the vent gas did not have a hydrogen sulfide concentration below 230 mg/dscm (0.10g	t the FCC Fla 1 in visible fla 1t gas did not	2017 flaring occurred a re gas recovery resulting malfunction, and the ver	ion: On June 28th, capacity of fla shutdown, or i	Event Descrip
Other: 40 CFR Subpart J (60.104(a)(1	Emission Paint:			6/28/2017	Discovered On:
AQMD:	Abatement Device :		Ongoing Event	Stopped: 6/28/2017 8:01 PM	Stopped: 6/2
Permit:	Source Number: S6016			/2017 8:00 PM	Event Started: 6/28/2017 8:00 PM
May have resulted in a violation of:					:

that led to the flaring.		
		May have resulted in a violation of:
Event Started: 6/30/2017 4:42 PM	Source Number: S6016	Permit:
Stopped: 6/30/2017 4:43 PM Ongoing Event	Abatement Device :	AQMD:
Discovered On: 6/30/2017	Emission Point:	Other: 40 CFR Subpart J (60.104(a)(1

Operations immediately responded to identify the source and optimize the flare gas compressor operations. The investigation is ongoing to identify the source Relief system flows momentarily exceeded the capacity of the Flare Gas Recovery Compressor resulting in visible flaring. An extensive review of process trends during the investigation identified that the flow to the relief system came through V-705, but the originating source of flow has not been definitively identified.

Corrective actions or preventative steps taken:

Probable Cause:

Event Description: On June 30th, 2017 flaring occurred at the FCC Flare (S-6016), when relief system flows exceeded the capacity of flare gas recovery resulting in visible flaring.

The flaring deviated from 40 CFR 60 Subpart J (60.104(a)(1)) because it was not due to a startup, shutdown, or malfunction, and the vent gas did not have a hydrogen sulfide concentration below 230 mg/dscm (0.10gr/dscf).

Corrective actions or preventative steps taken: Probable Cause: On June 30, 2017 Relief system flows momentarily exceeded the capacity of the Flare Gas Recovery Compressor resulting in visible flaring from 16:42hrs to 16:43 hrs. An extensive review of process trends during the investigation identified that the flow to the relief system came through V-705, but the originating source of flow has not been definitively identified.

Operations immediately responded to identify the source and optimize the flare gas compressor operations. The investigation is ongoing to identify the source that led to the flaring.

Corrective actions or preventative steps taken:

The Title V Deviation was submitted on July 5, 2017

he report was submitted the following business day on July 5, 2017.

submitted the following business day on July 5, 2017.

Event Description: On July 5, 2017 a Title V deviation report was submitted to the BAAQMD for the ESP operating with greater than 2 TR sets below 200mA from June 24, 2017 at 2017 at 2300 hours. As this Title V Deviation report had a due date falling on a national holiday, July 4, 2017, the report was

Probable Cause: The due date for submittal of the Title V deviation report was July 4, 2017, ten calendar days from June 24, 2017. Since the due date fell on a national holiday

7/20/2017	7/14/2017	7/14/2017	
Emission Point:	Abatement Device :	Source Number:	and the second s
Other:	AQMD: 2-1-301	Permit: 469 part 6E	May have resulted in a violation of:

Event Description: On July 20, 2017 during data review it was discovered that on July 14, 2017 1-1410 (5-4336) exceeded its daily firing rate limit or 600 MMB10/D HHV.

Discovered On:

Event Started: Stopped:

Corrective actions or Probable Cause: F-1410 exceeded its daily Title V Limit during a startup of the RLOP unit HNC (S-4342) following an unplanned shutdown. Due to the expedited shutdown of the firing the furnace at higher rates for a longer period of time than a typical start-up and operations was unaware that the firing limit is not exempt during a plant a higher temperature was required in the reactors as compared to a typical start-up in order to properly prepare the catalyst for operation. This required

preventative steps taken: startup of the unit.

The Refinery is revising its alarm strategy, notification protocol, and procedures for F-1410 and the HNC to prevent future occurrences

<u>م</u> 22	Event Description: On August 29, 2016, the BAAOMD issued a renewed Authority to Construct (ATC) for the carbon abatement drums (n August 29, 2016, the BAAOMD issued a renu	Fvent Description: C
Other:	Emission Point:	7/23/2017	Discovered On: 7/:
AQMD: Rule 2-1-302.1 & 2-1-307	Abatement Device :	☐ Ongoing Event	Stopped: 7/24/2017
Permit:	Source Number:		Event Started: 7/23/2017
May have resulted in a violation of :			

ATC, Chevron is required to submit a Start-up Notification to the BAAQMD at least seven days prior to operating the equipment. However, On July 23, 2017, the 21- pump station thermal oxidizer (A-623) shutdown due to low vacuum. In an attempt to mitigate emissions, the operator on crew placed the standby carbon drums in service, unaware of the current regulatory restriction. At the time of operation, only one of the two carbon drum trains were complete per the permit <u>ACIG conducted VOC inspections while the thermal-oxidizer was down with no excess emissions observed.</u> condition (Condition No. 25835 specifies that A-632 will consist of 2 sets of 3 carbon drums). Consequently, the carbon drums were operated without prior notification to the BAAMQD or a permit to operate. On July 24, 2017 it was discovered that the drums were operated and were immediately taken out of service.

Probable Cause:

Corrective actions or preventative steps taken:

is ongoing. However, at the time of operation, only one of the two carbon drum trains were complete and the start-up notification to the Air District was not submitted. It was found that the operating constraint on the carbon drums was not adequately communicated to the operators and mitigation techniques were not timely recognized to prevent the use of the carbon drums. At the time of the thermal oxidizer failure, the Air Compliance Inspection Group (ACIG) was On July 23, 2017, the 21- pump station thermal oxidizer (A-623) shutdown due to low vacuum. As operators begin troubleshooting, the stream was routed to the backup carbon drums. As with similar systems, back-up carbon drums are used in cases were the primary abatement device has failed and troubleshooting. contacted to conduct Method 21 monitoring on the associated pump seals. All pump seals passed inspection with no leak detection above 100ppm.

to control future use, on the conditions of use until the construction is complete and the startup notification is submitted to the BAAQMD. The carbon drum inlet valve has been tagged On July 24, 2017, it was discovered that the drums were operated, then were immediately taken out of service. Discussions were held with all operating crews

Event Description: On August 5, 2017, the Refinery discovere	Discovered On: 8/5/2017	Stopped: 8/5/2017	Event Started: 8/5/2017	
Event Description: On August 5, 2017, the Refinery discovered that the VOC inspections required by 8-44-305.3 were missed while loading	Emission Point:	Abatement Device :	Source Number: S9322	
while loading a tanker vessel at the Richmond Long	Other:	AQMD: 8-44-305.3	Permit:	May have resulted in a violation of :

Wharf.

Corrective actions or preventative steps taken: Probable Cause: On August 5, 2017, the Refinery discovered that VOC inspections were inadvertently missed while the Florida Voyager was loading regulated cargo. VOC inspections are routinely generated by the vapor designation on the Wharf Boat Sheet form, which is sent to a 3rd party VOC inspection contractor. Upon receipt, the VOC inspector is dispatched to the Richmond Long Wharf control room to check-in and confirm vessel inspections with operations. An investigation into the incident discovered the decision to load the Florida Voyager was not made until late in the evening, after the Wharf Boat Sheet had already been sent to the VOC inspection contractor. Upon arrival to the operation control room, the contractor assigned to perform the VOC inspections had the outdated ship schedule which did not list the Florida Voyager as needing to be inspected. It was not discovered until after the ship had completed loading that a VOC inspection receipt had not been given to operations.

communicated to the 3rd party VOC inspectors prior to arrival and will validate that Operators has been informed of change, adherence, and verification of correct documentation prior to loading cargo. The vessel coordinator will be accountable to ensure that all updated information is The Refinery has conducted meetings with the Operators to discuss the incident and confirm that all employees understand the expectation for procedure

8/8/2017	8/9/2017 Ongoing Event	8/4/2017		
Emission Point:	Abatement Device :	Source Number: \$4285		
Other:	AQMD: BAAQMD 1-522.4	Permit:	May have resulted in a violation of:	

Probable Cause:

Discovered On:

Event Started: Stopped:

preventative steps taken: Corrective actions or

Event Description: On August 2, 2017, a Cylinder Gas Audit (CGA) was performed on the FCC O2 analyzer as required per 40 CFR Part 60 App F 5.1.2. The Chevron Richmond Refinery was notified on August 8, 2017 by the third-party tester that the FCC O2 analyzer did not meet the linearity error criteria of <15%. Due to the late notification by the 3rd party tester an inoperative notification could not be submitted by the Refinery as required per BAAQMD Rule 1-522.4. The Refinery submitted an inoperative monitor notification on August 9, 2017 (RCA# 07E08). The CGA was re-performed on August 10, 2017 in which the FCC O2 analyzer met the linearity error criteria of <15%.

On August 2, 2017, Montrose Air Quality Services (MAQS) conducted the 3rd quarter Cylinder Gas Audit (CGA) on the Continuous Emissions Monitoring System error. After a complete investigation of the MAQS CGA procedure, it is the opinion of MAQS, that the failure of the CGA on the 5.56% O2 gas was caused by not introducing adequate flow from the cylinder regulator to overcome the CEMS sample pump. This allowed stack gas, which is normally \sim 1.7% O2, to be drawn in to the sample system. This caused the audit gas to be diluted with stack gas and led to the low reading on the O2 analyzer. The mid-range gas was introduced to the sample system. Richmond was not notified of the F-300 O2 analyzer CGA failure until August 8, 2017, which led to a Title V permit deviation. failure of the CGA on the 5.56% gas was caused by the tester and not by any malfunction of the CEMS O2 analyzer. Due to a procedural error, Chevron-4.46%. The percent error was 19.6%, which was higher than the allowable 15% according to 40 CFR Part 60. Appendix F requirements. The mid-range gas (8.93% O2) was then introduced to the CEMS and the average response was 8.89% O2. The percent error was 0.49%, which is well within the allowable 15% directly from the cylinder three separate times via a regulator and the ¼" tube. The response from the CEMS Q2 analyzer indicated an average response of introduced to the plant CEMS by connecting a 14" tube to the calibration line normally used by the plant CEMS for daily calibrations. The Q2 gas was injected rom a separate cylinder and regulator, adequate flow was achieved, and the response indicated that the analyzer was reading the gas correctly. Therefore, the (CEMS) serving the FCCU stack (F-300). During the CGA, the O2 analyzer indicated a failure of the CGA while introducing a 5.56% O2 gas. The gas was

target flow on the CEM system for calibration of gas rotometers. MAOS has amended their CGA procedure checklist to show the new CGA line connections, A improvement step was added that in the event a analyzer fails criteria that a Chevron representative will be contacted immediately. The Refinery is adding CGA lines to CEM system CGA ports where applicable. These lines will ensure that the proper gas flow is at the required pressure to match.

Event Description: On August 17, 2017 flaring occurred at the FCC flare (S-6016), SISO flare (S-6012) and NISO flare (S-6013) due to TKN tripping offline resulting in visible flaring. The flaring deviated from 40 CFR 60 Subpart J (60.104(a)(1)) because it was numbered malfunction, and the vent gas did not have a hydrogen sulfide concentration below 230 mg/dscm (0.10 gr/dscf).	Event Started: 8/9/2017 2:39 AM Stopped: 8/9/2017 3:09 AM Ongoing Event Discovered On: 8/9/2017
On August 17, 2017 flaring occurred at the FCC flare (S-6016), SISO flare (S-6012) and NISO flare (S-6013) due to TKN tripping offline resulting in visible flaring. The flaring deviated from 40 CFR 60 Subpart J (60.104(a)(1)) because it was number of the vent gas did not have a hydrogen sulfide concentration below 230 mg/dscm (0.10 gr/dscf).	Source Number: S6016 Abatement Device : Emission Point:
udue to TKN (S-4252) recycle compressor K-500 suse it was not due to a startup, shutdown, or scf).	May have resulted in a violation of: Permit: AQMD: Other: 40 CFR Subpart J (60.104(a)(1)

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preventative steps taken: Corrective actions or Probable Cause: On August 9, 2017 the TKN recycle gas compressor, K-500, tripped offline due to high liquid level in the knockout drum V-500. Operations followed emergency procedures to depressure the unit, which resulted in a flaring incident. Upon investigation it was discovered that alarms had potentially not been responded to appropriately, and a glitch in the PATE program that Control Board Operators use to temporarily "shelve" alarms, seemed to have allowed one high level alarm to be permanently disabled. It was also discovered that the level control valve on V-500 was being operated in manual which would have required operator

<u>how to prevent this glitch from occurring and develop stewardship report to catch future occurrences.</u> The Refinery is re-evaluating the alarm system to develop a patch to fix the glitch in the PATE system. If a patch is not available, train the Console Operators on

intervention to address the high liquid level.

each shift. It will include Head Operator review/oversight of the Console Operator routine duties. The Refinery is also implementing Console Operator Routine Duties that includes clear expectation that Console Operators review all active alarms multiple times

Event Started: Stopped: 8/21/2017 2/10/2017 Ongoing Event Abatement Device : Source Number:

Discovered On:

8/10/2017

May have resulted in a violation of : AQMD: Other: Permit: 26252 Parts 4 and 5

Event Description: Chevron did not provide a final count of fugitive components installed within 30 days of start-up of S-3230, pursuant to Permit Condition 26252 Part 4, and did <u>not provide to the District any required offsets within 14 days of that date as required pursuant to Permit 26252 part 5.</u>

Emission Point:

preventative steps taken: Corrective actions or Probable Cause: On August 10, 2017, in response to an Air District inquiry, HES discovered that the final list of fugitive components for the project to build T-3228 had not been BAAQMD on August 21, 2017 submitted within 30-days following start-up as required by Permit Condition 25848. The fugitive component count was determined and submitted to the

not give direction for project turnover when managed by outside consultants. Therefore, upon completion of tank construction the follow up items were left unassigned and were not tracked or properly managed An investigation determined that the roles and responsibilities for implementing conditions, in a newly acquired Air District permit, were not well defined and did

give direction to the Refinery Permitting Team and its consultants to assign roles and responsibilities for tracking and implementation requirements in Air District ATCs and PTOs. The Refinery is in the process of developing a written procedure for tracking and implementing requirements in Air District ATCs and PTOs. The procedure will

Event Description: The electrostatic precipitator (ESP) (A-0014) is used for abating Particulate Matter (PM) emissions from the Fluid Catalytic	Discovered On: 8/26/2017	Stopped: 8/27/2017 1:00 AM Ongoing Event	Event Started: 8/26/2017 7:00 AM	
used for abating Particulate Matter (PM) emissions from the F	Emission Point:	Abatement Device: A0014	Source Number: \$4285	
Fluid Catalytic Cracking (FCC) Plant (S-4285) which	Other:	AQMD:	Permit: Title V permit condition #1106	May have resulted in a violation of :

is comprised of sixteen (16) transformer rectifier (TR) sets. On August 26, 2017, at 0656 hours, the Refinery's Fluid Catalytic Cracking (FCC) unit (54285) sputdown due to a power outage. As a result, the ESP was operating with greater than two TR sets below 200mA and the remaining TR sets were less then 296mA averaged over a 3 hour period. The immediate shutdown of the TR sets is seen as an industry-wide practice to remove the potential source of ignition.

preventative steps taken: Corrective actions or Probable Cause: On August 26, 2017, during heavy fog conditions the refinery Standard Oil power line opened at 06:52hrs causing substations #3 and #6 to go to single line critical equipment resulted in the FCC unit having to shutdown to a safe park mode. In this mode the ESP is shutdown immediately as a recognized safe practice throughout the Refinery's electrical grid. The power dips caused several loads in FCC and SRU to go off line impacting a loss of critical equipment. The loss of eed. Approximately 22 minutes later the line experienced another momentary power loss. The two line faults caused a voltage dip in the system that was seen

normal service. The other Refinery substations were inspected to identify any other impact from the power dip. FCC feed was re-introduced at 19:20hrs once power was restored and stable to the unit The Refinery's electrical distribution coordinator was contacted immediately, and Utilities Operators worked to return the Refinery electrical system back to

Discovered On: Event Started: Stopped: 8/26/2017 3:00 PM 8/26/2017 6:00 PM 8/26/2017 Ongoing Event Abatement Device: Source Number: \$4285 **Emission Point:** A0014 May have resulted in a violation of : Permit: Title V permit condition #1106

Event Description: On August 26, 2017, at 15:00 hours, the Refinery's Fluid Catalytic Cracking (FCC) unit (\$-4285) shutdown due to a power outage. As a result, the Electrostatic Precipitator (ESP) (A-0014) inlet temperature dropped below 550F averaged over any one hour period. The immediate shutdown of the ESP TR sets, is seen as <u>an industry-wide practice to remove the potential source of ignition.</u>

Corrective actions or preventative steps taken: Probable Cause: On August 26, 2017, during heavy fog conditions the refinery Standard Oil power line opened at 06:52hrs causing substations #3 and #6 to go to single line feed. Approximately 22 minutes later the line experienced another momentary power loss. The two line faults caused a voltage dip in the system that was seen throughout the Refinery's electrical grid. The power dips caused several loads in FCC and SRU to go off line impacting a loss of critical equipment. The loss of critical equipment resulted in the FCC unit having to shutdown to a safe park mode. In this mode the ESP is shutdown immediately as a recognized safe practice

to remove the potential source of ignition.

power was restored and stable to the unit. normal service. The other Refinery substations were inspected to identify any other impact from the power dip. FCC feed was re-introduced at 19:20hrs once The Refinery's electrical distribution coordinator was contacted immediately, and Utilities Operators worked to return the Refinery electrical system back to

Event Dec	Discovered On:	Stopped: 5/25/2017	Event Started: 8/31/2017		
rintion. On August	8/31/2017	/25/2017	3/31/2017		
21 2017 during an IDAB Cor		Ongoing Event	i 		
rept Doese Audit has	<u></u>	Abater	Sou	-]
walves and at ECC limit (6 4305) a	Emission Point:	Abatement Device :	Source Number: S4285		
ad the other at DOLV	1	ŀ	I]
Birst Description: On August 21, 2017 during an IDAD Concept Docume August has related and the other at DOLY (C A202) were discovered to be out of	Other: 40 CFR 60.482-7(c)(2)	AQMD:	Permit:	May have resulted in a violation of:	

Event Description: On August 31, 2017 during an LDAK Consent Decree Audit two Valves one at FLC unit (3-4285) and the order at POLY (3-4292) were discovered to be out of compliance with inspection requirements outlined in 40 CFR 60.482-7(0)(2). The FCC valve (101-01791-V) had an excess reading of over 10.000ppm on July 27. 2015, but the follow up monthly inspections were not triggered by LeakDAS. The next inspection was conducted on Oct. 1, 2015 with a result of Oppm. The Poly plant valve(110-01237-V) had an excess reading of over 10.000ppm on July 7, 2016. A successful inspection was completed in August, 2015, but the LeakDAS database did not trigger the second follow up inspection. The next inspection was conducted Dec. 13, 2016 with a reading of 25ppm.

preventative steps taken: Corrective actions or Probable Cause:

the Richmond Refinery. When the two valves in question had inspection results of greater than 10,000 ppm VOC, the program should have triggered monthly reinspections until there were two successful monthly inspections, then reverted back to quarterly inspection intervals. Due to a software glitch the LeakDas A system glitch was discovered in the LeakDas database system that is used to track and schedule inspections for approximately 450,000 VOC components at

Both valves have been re-inspected and passed with results of 0.0 and 25.0ppm VOC. After discovery of the issue, the Vendor updated the LeakDas software to program did not trigger all of the additional valve inspections and they were inadvertently missed.

<u>address the scheduling glitch. The new software has been uploaded to the Richmond LeakDas database.</u>

Page 24 of 34

Event Description: The following	Discovered On: 9/1/2017	Stopped: 9/1/2017 9:55 PM	Event Started: 9/1/2017 1:58 PM	
o deviations are being submitted in a		Ongoing Event		
Event Description: The following deviations are being submitted in an abundance of caution to meet reporting requirements as the investigation is proposed. On September 1, 2017	Emission Point:	Abatement Device :	Source Number: S6010	
s as the investigation is ongoing. On September 1, 2017	Other: 40CFR 60 Subpart J (60.104)	AQMD: BAAQMD 12-11-502.3(a)	Permit:	May have resulted in a violation of :

Discover

preventative steps taken: Corrective actions or

Probable Cause: On September 1, 2017, the Chevron Richmond Refinery experienced unprecedented high ambient temperatures with an indicated daytime high of 107 degrees. Fahrenheit. As a result of the effects of the unusually high ambient temperatures on the D&R processing units, there was a significant increase in the amount of overhead vapors. At approximately 13:58 hours, vapor production from the #4 Crude Unit increased above the capacity of the available flare gas recovery. compressors. Process moves were initiated to mitigate relief pressure which resulted in additional flows to be routed to the Jet Hydrotreater. The surplus of liquid overwhelmed V-240 and resulted in the high liquid level shutdown of flare gas recovery compressor, K-242, at approximately 15:00 hours, Flaring ceased at minutes. Therefore, the sample collected fell outside of the BAAQMD 12-11-502.3(a) requirement. However, the sample that was taken is considered epresentative for the flaring event.

flaring occurred at the LSFO flare (S-6010). The flaring may have potentially deviated from 40CFR 60 Subpart J (60.104(a) (1)) because it may not have been due to startup, shutdown, or malfunction, and the vent gases did not have a hydrogen sulfide concentration below 230mg/dscm (0.10gr/dscf), Additionally, a review of the flare flow data indicates that the initial sample was collected approximately 1 minute prior to the vent gas exceeding 330 scfm for 15 consecutive

(CBO). Upon investigation, it was discovered that the CBO prematurely initiated a manual flare sample approximately 1 minute prior to the vent gas exceeding 330 scfm for 15 consecutive minutes. This decision was based on the flaring inception rather than the flow requirements of BAAQMD Regulation 12, Rule 11, 502.3(a). Unknown to the CBO, the premature sample did not fulfill the requirements of BAAQMD Regulation 12, Rule 11. The LFSO flare sample system has triggers that can be initiated either by Distributed Control System (DCS) logic or manually by the Console Board Operator

approximately 21:55 hours when liquid levels were reduced and flare gas recovery compressor K-242 was able to be restarted.

units. The Refinery Operating Committee is evaluating the Hot Weather Contingency Plan for posturing plants so that further mitigations are in place to prevent potential flaring and/or environmental incidents. Furthermore, as a result of the premature flare sample, refresher training was conducted with the plant. <u>operators to confirm they were comfortable with the auto-sampler logic, and fully understood the flare sample requirements.</u> Prior to, during, and after the flaring, operations continued to reduce feed to the #4 Crude Unit to limit the impact of high ambient temperature on the affected

Event Description:	Discovered On:	Stopped: 9/9/2017 1:00 AM	Event Started: 9/7/2017 10:00 PM		
On September 7, 2017 #3H2S plant in the	9/7/2017	1:00 AM Ongoing Event	10:00 PM		
Event Description: On September 7, 2017 #3H2S plant in the FCC (S-4285) experienced a plant upset resulting in H2S exceedance in fuel gas drums V-475 and V-701, V-475 fuel gas drums V-475 and V-701, V-475 fuel gas drums V-475 and V-701, V-475 fuel gas drums overabled the	Emission Point:	Abatement Device :	Source Number: S4155		
eedance in fuel gas drums V-475 and V-701. V-475 fuel	Other: 40CFR60.104(a)(1)	AQMD:	Permit: 8773	May have resulted in a violation of :	

das drum exceeded it Suppm 4-hr average H2S limit from September 8, 2017 at 0100hrs to september 9, 2017 at 0100hrs. V-4/5 litel gas drum exceeded its 160 ppm 3-hr average H2S limit from September 7, 2017 at 2300hrs to September 8, 2017 at 0400hrs. V-701 fuel gas drum exceeded its 160 ppm 3-hr average H2S limit from September 7, 2017 at 2200 hrs to September 8, 2017 at 0500hrs. The source affected by the excess of the 24-hour 50 ppm H2S limit is F-135 (5-4155). The sources affected by the excess of the 3-hour 160 ppm H2S limit at V-701 include 1-Boiler (5-4129), 3-Boiler (5-4131), 4-Boiler (5-4132), 5-Boiler (5-4132), 5-Boiler (5-4133) and 7-Boiler (5-4135) and Cogen 1000 Train HSRG (5-4351). The sources affected by the excess of the 3-hour 160 ppm H2S limit at V-475 include F-410 (5-4154), F-420 (5-4154), F-130 (5-4157), F-500 (5-4161, S-4162 & S-4161), F-600 (5-4164, S-4165 & S-4166), F-730 (S-4168), F-731 (S-4169), F-100 (5-4154), F-135 (5-4155), F-340 (S-4158), F-305 (S-4170), F-125 (S-4333, S-4334 & S-4335), F-1361 (S-4330, S-4331 & S-4332), F-1551 (S-4330, S-4331, S-4331 & S-4332), F-1551 (S-4330, S-4331, S-4331), F-1551 (S-4330, S-4331), F-1551 (4336, S-4337, S-4338 & S-4339), F-1650 (S-4339), F-651 (S-4188) and F-661 (S-4189).

This updated Deviation is being submitted to correct an administrative error: The original date of occurance was submitted as August 7, 2017 but has been corrected to read September 7, 2017.

preventative steps taken: Probable Cause: The FCC #3H2S plant in the FCC experienced a plant upset caused by C-220 amine regenerator bottoms level indication failure. The false level indication on C-220 began to fill the column to a high level leading to poor H2S removal in the amine regenerator. The poor stripping of H2S in the amine regenerator resulted in H2S breakthrough from absorber C-200 into the Refinery fuel gas system. It was found that the level indication failure was due to plugging at both the level transmitter taps and the gage glass on C-220.

ound that two orfice plates upstream of the level indicators were the source of the plugging. Both orfice plates have been removed to aid in the prevention of Operations reduced the FCC plant feed rates and made the necessary corrective actions to control and lower the H2S content in the fuel gas system, It was uture plugging of the level transmitter taps.

Event Started: Stopped: 9/7/2012 9/11/2017 Ongoing Event Source Number: Emission Point: S4429 May have resulted in a violation of : Permit: 40 CFR 60.482.7 Rule 8-18-402.1

Event Description: On September 7, 2017, during an LDAR Consent Decree Audit, one (1) valve at the #8 Plant was discovered to be undocumented and missing from the LDAR <u>racking database.</u>

preventative steps taken: Corrective actions or Probable Cause: The addition of the valve component was not correctly documented so was not added to the Refinery LDAR database (LeakDas). There are approximately 450,000 VOC components tracked in the Refinery, without being added to the LeakDas database it was not tracked or scheduled with the other VOC components at the Richmond Refinery.

<u>management of change will be initiated to reflect the changes in the field and update associated drawings and documents</u> After review it was determined that the valve was not needed, it was removed from service verified and inspected by the Air Compliance Inspection Group. A

Grant Despiration: On Sentember 11 1017 Julian Jahra and State of Sentember 10 1017 Julian Jahra and Sentember 10 1017 Julian Jahra Andrew 10 1017 Julian Jahra Andrew 10 1017 Julian Jahra and Sentember 10 1017 Julian Jahra and Sente	Discovered On: 9/11/2017 Emission Point:	Stopped: 9/10/2017 Ongoing Event Abatement Device :	Event Started: 9/10/2017 Source Number: \$4163	
	Other:	AQMD: 2-1-301	Permit: PC#16686	May have resulted in a violation of :

Event Description: On September 11, 2017 during data review it was discovered that on September 10, 2017 F-530 (S-4163) exceeded its daily firing rate limit of 1464 MMBtu/D HHV.

Probable Cause:

Corrective actions or preventative steps taken: The investigation found that there was not clear guidance regarding operations response to an F-530 furnace daily firing rate exceedance. The current DCS control system has an alarm set up for hourly average firing duty, but it does not account for the actual calendar day average limit. After review it was noted that there wasn't specific guidance in the critical environmental variable warnings or XAN's alerts identifying corrective actions to be taken or that the consequence of deviation could result in a Title V deviation.

- The Refinery is reviewing the following mitigations to aid in the prevention of future occurrences:
- Developing a tool to monitor current 24 hour average firing rate and predict daily average.
- Updating Critical Environmental Variable warnings to include corrective actions and a warning for a Title V permit consequence.
- If possible, create a Title V Furnace Firing Duty page for the Refinery process monitoring Index program. Review the Electronic Operating Manual to add firing rate console alarms to the Consequence of Deviation table and include corrective actions.
- Update the XANs alert distribution list for furnace firing rates to include appropriate personnel.

Event Started: Stopped: 10/16/2017 11:00 PM 10/14/2017 Ongoing Event

Discovered On:

10/14/2017

Abatement Device: A0014 Source Number: S4285

Emission Point:

May have resulted in a violation of : Permit: Title V permit condition #1106

Event Description: The electrostatic precipitator (ESP) (A-0014) is used for abating Particulate Matter (PM) emissions from the Fluid Catalytic Cracking (FCC) Plant (S-4285) which is comprised of sixteen (16) transformer rectifier (TR) sets Following an unexpected shutdown for the Refinery's Fluid Catalytic Cracking (FCC) unit (S-4285) on October 14, 2017, the FCC electrostatic Precipitator (A-0014) required an emergency shutdown. De-energizing the ESP during unstable operations is an industry wide safety standard. As a result, the ESP operated with greater than 2 TR sets below 200 mA and the remaining TR sets were less than 296 mA averaged over a three hour period from 10/14/17 at 2300 hours to 10/16/17 at 2300 hours.

preventative steps taken: Corrective actions or Probable Cause: On October 14, 2017 the FCC (S-4285) substation bus unexpectedly lost power due to a bus ground relay activating resulting in a fault that caused a loss of power. Upon inspection of the affected bus a rodent was found to have entered the 12kv breaker causing the ensuing fault which led to the loss of power. The breaker was damaged from the fault and led to a complete power loss at the Alky, Poly, Butamer, and Yard DIB units and a partial loss of power at the FCC. In

The 12kv breaker was replaced with a spare to restore power. Operations re-established plant operations and started the FCC on October 16, 2017

response to the loss of power the FCC plant was moved to a safe posture in which the ESP is de-energized as an industry recognized safety measure

Started: 10/23/2017 1:00 PM topped: 10/23/2017 2:00 PM	Started: 10/14/2017 topped: 10/16/2017 7:00 PM red On: 10/14/2017 Event Description: Following ar 0014) required temperature 1900 hours. Probable Cause: On October power. Upor breaker was response to The 12kv breaker browners.
Ongoing Event	Ongoing Event Lunexpected shutdown for the red an emergency shutdown. 1-hr average dropped below 14, 2017 the FCC (\$-4285) su inspection of the affected bu damaged from the fault and the loss of power the FCC planaker was replaced with a spanaker was replaced with a spanake
To a second seco	P. Refinery's F. Refinery's F. Souded Foundation bus a rodent was moyed to a compute was moyed to a compute was moyed to restore to restore
Source Number: 54229	Started: 10/14/2017 Source Number: 54285 Source Number: 54285 Permit: Title V permit condition of : Appled: 10/16/2017 7:00 PM
	ober 14, 2017 y wide safety s y activating re g the ensuing re g the ensuing 1 ard DIB units a ed as an indust s and started th
May have resulted in a violation of ; Permit:	May have resulted in a violation of: Permit: Title V permit condition #110 AQMD: Other: the FCC Electrostatic Precipitator (A-tandard. As a result, the ESP inlet in 10/16/17 at 0100 hours to 10/16/17 at in 10/16/17 at 0 the loss of power. The fault which led to the loss of power. The ind a partial loss of power at the FCC. In try recognized safety measure. The FCC on October 16, 2017.

Corrective actions or preventative steps taken:

Discovered On:

Event Started: Stopped:

Discovered On: Event Started: 10/23/2017 1:00 PM 10/23/2017 2:00 PM 10/24/2017 Ongoing E

Event Description: On October 23, 2017 the SRU #3 Train (S-4229) had SO2 excess emissions above the 250 ppm limit.

Corrective actions or preventative steps taken: Probable Cause: The SRU #3 Train main air blower, K-2301, had developed a leak in the governor gear box lube oil tubing. While operators were working to inspect the leak location so that repairs could be made, the blower tripped off-line. The investigation postulates that bumping the lube oil tubing may have led to a momentary resulting in the shutdown of the front end of drop in lube oil pressure which caused the blower to shutdown. The blower trip caused a low differential pressure resulting in the shutdown of the front end of the SRU #3 train and the SO2 excess.

The Refinery immediately altered operations to address and manage H2S feed due to the loss of the train until it was brought back on line. The train was immediately stabilized and the governor gear box lube oil tubing was repaired. Feed to the #3 Train was re-introduced within the hour.

10/26/2017	10/25/2017	10/25/2017	
Emission Point:	Abatement Device :	Source Number: \$4393	
Other: H&S Code - 41700	AQMD: Regulation 1-301	Permit:	May have resulted in a violation of :

Event Description: On October 26, 2017, the Chevron Refinery was issued a Public Nuisance NOV (A56424) alleging the bioreactor by BAAQMD Inspector Ying Yu for 5 confirmed complaints on October 25, 2017.

Corrective actions or Probable Cause: On October 25, 2017, BAAQMD Inspector Ying Yu contacted the Chevron Richmond Refinery Shift Leader (RSL) informing them of 5 confirmed odor complaints originating from locations in the nearby community of Point Richmond between the hours of 17:00 and 21:45.

preventative steps taken:

Discovered On:

Event Started: Stopped:

Of the 5 complaints confirmed on October 25, 2017, none resembled an odor typical of a Refinery or the Bigreactor. The odor descriptions given such as "poop" and "chemical" are inconsistent with any potential odors associated with the Refinery Bigreactor. Moreover, the complaints given resembled descriptions consistent with Chevron's off-site findings. Chevron likewise is concerned about identifying the cause of the odor complaints and preventing reoccurrence but <u>these complaints are inconsistent and do not provide reasonable contention that the Refinery Bioreactor was the source.</u>

Based on the Refinery's investigation into these odor complaints, the Refinery disagrees with the Inspector's confirmation of the odor complaints as being from other locations, and that are reported to the District, are often incorrectly attributed to the Refinery, treatment facilities, composting and landfill operations surround an enclave of residential housing. The Refinery contends that in many cases, odors that emanate preventing reoccurrence. However, the Refinery operates in an area where multiple potential odor sources, including various industries, train yards, water sociated with the Refinery Bioreactor. Chevron shares the BAAQMD's concern and sense of urgency in identifying the cause of the odor complaints and

Chevron would appreciate the opportunity to conduct the odor investigation jointly with the inspector during times when Chevron is suspected rather than react retroactively to an investigation that has already concluded several hours prior. The Refinery continues to explore opportunities to mitigate potential odors the absence of any air monitoring alerts the Refinery maintains that Notice of Violation #A56424 was issued improperly, violation, the Refinery was operating at a steady state with no surrounding community monitor alerts. There were no activities at the Refinery that would have caused any odors. Additionally, the Refinery was utilizing its deodorant system full time while increased the load on the Refinery effluent system full time while associated with its processes. The Refinery maintains and employs deodorant dispersal nozzles to assist with surrounding odors. At the time of the alleged inds were coming from the north and blowing towards Point Richmond. Given the nature of the odor complaints, the stable operations of the Refinery that day

Timet Providence Or Other .	Discovered On: 10/26/2017	Stopped: 10/24/2017	Event Started: 10/24/2017		
7017 the Channel Because in		Ongoing Event			
	Emission Point:	Abatement Device :	Source Number: S4393		
	Other: H&S Code - 41700	AQMD: Regulation 1-301	Permit:	May have resulted in a violation of :	

Event Description: On October 26, 2017, the Chevron Retinery was issued a Public Nulsance NOV (A55/88) alleging the bioreactor by BAAQMD Inspector Jacqueline Huynh for 10 confirmed complaints on October 24, 2017.

Probable Cause: On October 24, 2017, BAAQMD Inspector Jacqueline Huynh contacted the Chevron Richmond Refinery Shift Leader (RSL) informing them of 10 confirmed odor complaints originating from locations in the nearby community of Point Richmond between the hours of 18:00 and 21:00.

preventative steps taken: Of the 10 complaints confirmed on October 24, 2017, only two resembled an odor typical of a Refinery and were described as "sour Oily" and "burnt gasoline", source. complaints and preventing reoccurrence but these complaints are inconsistent and do not provide reasonable contention that the Refinery Bioreactor was the However, these odor descriptions are inconsistent with any potential odors associated with the Refinery Bioreactor. Moreover, the complaints given resembled descriptions consistent with Chevron's off-site findings which were described as "sewage". Chevron likewise is concerned about identifying the cause of the odor

preventing reoccurrence. However, the Refinery operates in an area where multiple potential odor sources, including various industries, train yards, water Based on the Refinery's investigation into these odor complaints, the Refinery disagrees with the Inspector's confirmation of the odor complaints as being associated with the Refinery Bioreactor. Chevron shares the BAAQMD's concern and sense of urgency in identifying the cause of the odor complaints and <u>from other locations, and that are reported to the District, are often incorrectly attributed to the Refinery.</u> treatment facilities, composting and landfill operations surround an enclave of residential housing. The Refinery contends that in many cases, odors that emanate

retroactively to an investigation that has already concluded several hours prior. The Refinery continues to explore opportunities to mitigate potential odors associated with its processes. The Refinery maintains and employs deodorant dispersal nozzles to assist with surrounding odors. At the time of the alleged Chevron would appreciate the opportunity to conduct the odor investigation jointly with the inspector during times when Chevron is suspected rather than react violation, the Refinery was operating at a steady state with no surrounding community monitor alerts. There were no activities at the Refinery that would have increased the load on the Refinery effluent system, or would have caused any odors, Additionally, the Refinery was utilizing its deodorant system full time while the absence of any air monitoring alerts the Refinery maintains that Notice of Violation #A55788 was issued improperly. winds were comina from the north and blowing towards Point Richmond. Given the nature of the odor complaints, the stable operations of the Refinery that day,

Examt Description: On October 36 3017 the Chause Define	Discovered On: 10/26/2017	Stopped: 10/23/2017	Event Started: 10/23/2017		
First Occidation: On Ottobox 16, 2017, the Program Define the Principles and April 1977 Allegans and A	Emission Point:	Abatement Device :	Source Number: S4393		
	Other: H&S Code - 41700	AQMD: Regulation 1-301	Permit:	May have resulted in a violation of :	

Event Description: On October 26, 2017, the Chevron kennery was issued a Public Nuisance NOV (A55/87) alleging the bioreactor by BAAQMD Inspector Jacqueline Huynh for 5 confirmed complaints on October 23, 2017.

Probable Cause:

preventative steps taken: Corrective actions or On October 23, 2017, BAAQMD Inspector Jacqueline Huynh contacted the Chevron Richmond Refinery Shift Leader (RSL) informing them of 5 confirmed odor complaints originating from locations in the nearby community of Point Richmond between the hours of 17:30 and 18:20.

Of the 5 complaints confirmed on October 23, 2017, only two resembled an odor typical of a Refinery and were described as "sour Oily" and "Petroleum". Bioreactor was the source. However, these odor descriptions are inconsistent with any potential odors associated with the Refinery Bioreactor. Moreover, the complaints given resembled descriptions consistent with Chevron's off-site findings on October 24, 2017 which were described as "sewage", Chevron likewise is concerned about identifying ause of the odor complaints and preventing reoccurrence but these complaints are inconsistent and do not provide reasonable contention that the Refinery

from other locations, and that are reported to the District, are often incorrectly attributed to the Refinery. preventing reoccurrence. However, the Refinery operates in an area where multiple potential odor sources, including various industries, train yards, water Based on the Refinery's investigation into these odor complaints, the Refinery disagrees with the Inspector's confirmation of the odor complaints as being associated with the Refinery Bioreactor. Chevron shares the BAAQMD's concern and sense of urgency in identifying the cause of the odor complaints and treatment facilities, composting and landfill operations surround an enclave of residential housing. The Refinery contends that in many cases, odors that emanate

violation, the Refinery was operating at a steady state with no surrounding community monitor alerts. There were no activities at the Refinery that would have increased the load on the Refinery effluent system, or would have caused any odors. Additionally, the Refinery was utilizing its deodorant system full time while winds were coming from the north and blowing towards Point Richmond. Given the nature of the odor complaints, the stable operations of the Refinery that day, the absence of any air monitoring alerts the Refinery maintains that Notice of Violation #A55787 was issued improperly. retroactively to an investigation that has already concluded several hours prior. The Refinery continues to explore opportunities to mitigate potential odors associated with its processes. The Refinery maintains and employs deodorant dispersal nozzles to assist with surrounding odors. At the time of the alleged Chevron would appreciate the opportunity to conduct the odor investigation jointly with the inspector during times when Chevron is suspected rather than react

Event Description: The electrostatic precipitator (ESP) (A-	Discovered On: 10/30/2017	Stopped: 10/30/2017 5:00 PM Ongoing Event	Event Started: 10/30/2017 3:00 PM	
Event Description: The electrostatic precipitator (ESP) (A-0014) is used for abating Particulate Matter (PM) emissions from the Fluid Catalytic	Emission Point:	Abatement Device : A0014	Source Number: \$4285	
the Fluid Catalytic Cracking (FCC) Plant (S-4285). On	Other:	AQMD:	Permit: Title V permit condition #1106	May have resulted in a violation of :

October 30, 2017, during an upset at the FCC Plant, the Electrostatic Precipatator required an emergency shutdown. As a result, the ESP operated with one TR sets were less than 296 mA averaged over a three hour period from 1500 to 1700 hours. The immediate shutdown of

preventative steps taken: Probable Cause: On October 30th, 2017 the FCC V-134 pressure indicator 52P1134 for the 2nd stage knock out suction pressure for K-130 wet gas compressor became very erratic which activated the Compressor Controls Corporation system (CCC) anti-surge that controls and protects K-130 WGC. The erratic pressure indication on \$2P1134\$ caused the K-130 spillback to open up resulting in increased pressure swings on the front end of the FCC unit. The resulting plant upset caused a high CO condition in the Electrostatic Precipitator (ESP) which led Operations to shutdown the ESP per procedure as a safety precaution. The ESP being shut down the TR sets is seen as an industry-wide practice to remove the potential source of ignition.

is evaluating potential ways to add secondary indication to compare, monitor, and check accuracy of current meter PI-134 (2nd stage suction press. indicator) FCC operations immediately worked to stabilize the pressure swings and control plant conditions. Once the plant was stable the ESP was placed back in service. Both 1st stage S2UC-131 and 2nd stage S2UC-132 anti-surge controllers are being operated in manual to protect K-130 WGC from pressure swings. Operations

6007		2017	200	
Other:	Emission Point:		10/30/2017	Discovered On:
AQMD:	Abatement Device :	Ongoing Event	Stopped: 10/30/2017 4:00 PM	Stopped:
Permit:	Source Number: S4285		Event Started: 10/30/2017 2:00 PM	Event Started:
May have resulted in a violation of ;				

Event Description: On October 30, 2017, the Refinery's Fluid Catalytic Cracker (FCC) (S-4285) F-300 stack exceeded its opacity limit of 30% over the 6-minute average during the 1400 and 1500 hrs.

preventative steps taken: Probable Cause: On October 30th, 2017 the FCC V-134 pressure indicator 52P1134 for the 2nd stage knock out suction pressure for K-130 wet gas compressor became very CO condition in the Electrostatic Precipitator (ESP) which led Operations to shutdown per procedure as a safety precaution. With the ESP being shut down an erratic which activated the Compressor Controls Corporation system (CCC) anti-surge that controls and protects K-130 WGC. The erratic pressure indication on 52P1134 caused the K-130 spillback to open up resulting in increased pressure swings on the front end of the FCC unit. The resulting plant upset caused a high

is evaluating potential ways to add secondary indication to compare, monitor, and check accuracy of current meter PI-134 (2nd stage suction press. indicator). FCC operations immediately worked to stabilize the pressure swings and control plant conditions. Once the plant was stable the ESP was placed back in service. Both 1st stage 52UC-131 and 2nd stage 52UC-132 anti-surge controllers are being operated in manual to protect K-130 WGC from pressure swings. Operations

1	Discovered On:	Stopped:	Event Started:		
	10/30/2017	Stopped: 10/30/2017 2:55 PM	Event Started: 10/30/2017 2:38 PM		
		Ongoing Event			
	•	_			
	Emission Point:	Abatement Device :	Source Number: S6016		
•		•			
	Other:	AQMD: Reg. 12-11-502.3 1 (a)	Permit:	May have resulted in a violation of :	

Event Description: On October 30, 2017, during an upset at the FCC Plant (S-4285), a flare sample from the FCC flare was not successfully pulled as required per BAAQMD Regulation 12-11-502.3 1(a).

preventative steps taken: Corrective actions or Probable Cause: Upon investigation of this incident the sample station was evaluated by maintenance. It was found that the Flare sample return line was plugged. It was also valve was found to be broken. liscovered that the check valve on the bypass line that bypasses the gas returning from the sample cylinders was not working correctly. The spring in the check

parts have been ordered for future repairs outside of the scheduled preventative maintenance program Maintenance crew working on the FCC flare sample station was able to unplug the return line and replace the bypass line check valve. To aid in the prevention of any other potential mechanical failures the sample pump was replaced. The system programming logic, solenoids, and mechanical valves were tested and spare

				1
Other: 40CFR 60.102(a)(2)	Emission Point:		11/8/2017	Discovered On:
AQMD:	Abatement Device: A0014	Ongoing Event	Stopped: 11/8/2017 3:00 PM	Stopped:
Permit:	Source Number: S4285]	Event Started: 11/8/2017 2:00 PM	Event Started:
May have resulted in a violation of :				

Event Description: On November 8, 2017, the FCC Electrostatic Precipitator (A-0014) required an emergency shutdown. As a result, the F-300 stack opacity exceeded its 30% second 6-minute average limit on 11/8/17 during the 1400 clock hour with an indicated excess of 60.73%.

preventative steps taken: Corrective actions or Probable Cause: followed safety standards and shutdown the ESP per procedure. Investigation findings determined that the high CO was a result of a tank switch upstream resulting in an instantaneous feed composition change and flow increase. Blending and Shipping was performing a non-routine change from FCC plant dual line feed to a single line feed system, which resulted in a change in feed composition and resulted in a plant upset. The FCC Plant had an opacity excursion due to an emergency shutdown of K-13 Electrostatic Precipitator (ESP) due to a sudden increase in CO. Operations

sampling and properties confirmation prior to feed switches. The Refinery is reviewing feed system transition procedures for potential improvement updates requiring feed tanks to be tagged identifying the need for

Discovered On: 12/20/2017	Stopped: 12/20/2017 12:00	Event Started: 12/20/2017 11:00 AM		
7	PM Ongoing Event	AM		
Emission Point:	Abatement Device :	Source Number: S4228		
Other:	AQMD: 9-1-307	Permit:	May have resulted in a violation of :	

Event Description: On December 20, 2017 the SRU #2 Train (\$-4228) had SO2 excess emissions above the 250 ppm limit from 1100 hours to 1200 hours.

preventative steps taken: Corrective actions or Probable Cause: On December 20, 2017 at approximately 1030 hours, the Sulfur Recovery Unit (SRU) #2 train was shut down resulting in an excess of the 1-hour average 250 actions or pgm SQ2 limit. Investigation findings showed that Operations was responding to a governor issue on #3 train, when #2. Itain main reaction furnace tripped offline. There was a communication breakdown that occurred during the initial report between the control board operator and one of the outside area operators. The operator did not verify location with Control Board Operator and responded to SRU #2 train blower. The operator saw a dip in RPM at the blower of #2 train, so proceeded to place the blower controls in manual to catch the dip. When control of #2 train was set back to auto, the controllers output was not set appropriately which led to the #2 train shutting down on differential pressure and the exceedance of the 1-hour average 250 ppm limit.

Refinery's operational excellence goals to gain commitment to focus on clear communication during any incident response The shift supervisor addressed the communication breakdown and held a discussion with the operator and the crew. This was done in accordance with the

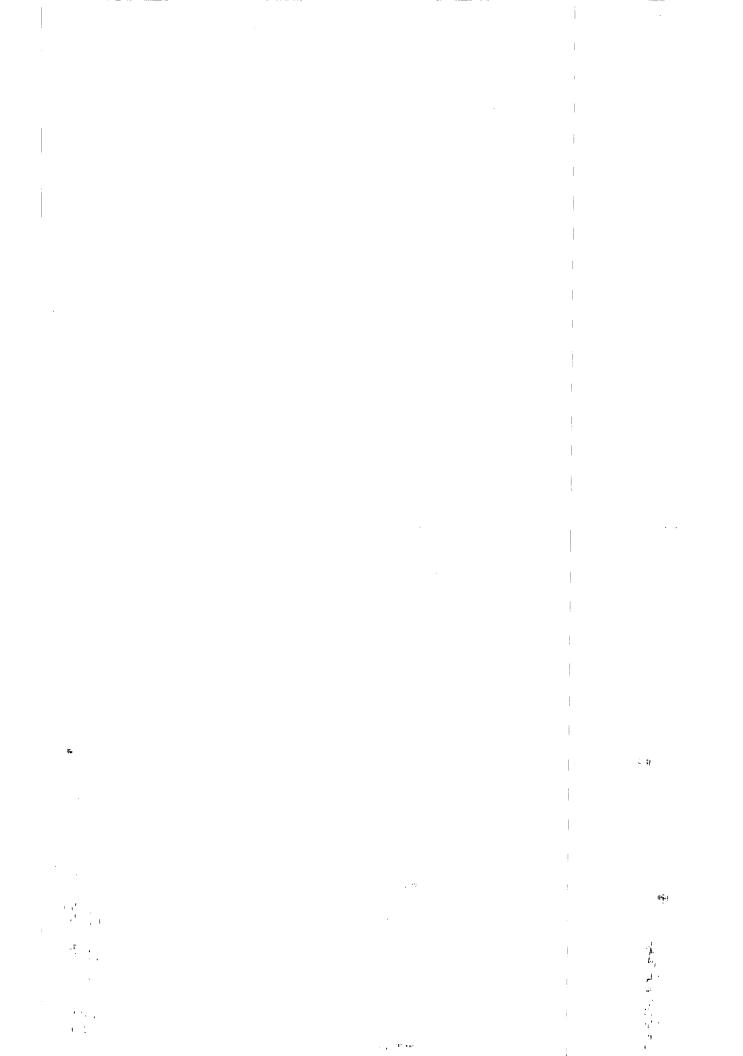
Certification Statement

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

Signature of Responsible Official Print Name Kory Judd General Manager Richmond Refinery

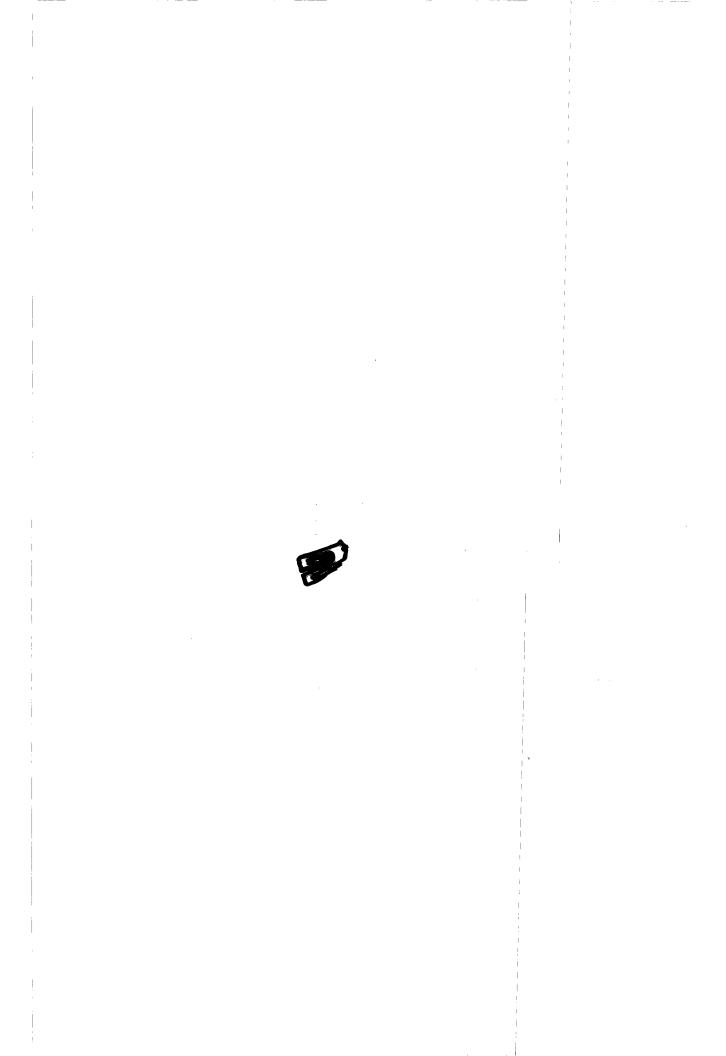
BAAQMD Title V Permit 6 Month Monitoring Report

	6 M	6 Month Monitoring Report
	Fr	From 6/1/2017 to 12/31/2017
	A0010 Chevron Richmond Refinery	nery
	Facility Address: 841 Chevron Way	Mailing Address PO Box 1272
	City: <u>Richmond</u>	City: Richmond
	Zip Code: <u>94801-</u> Contact: <u>Juliana, Robin W</u>	Zip Titles Compliance Tee
Inoperable monitors as defined by BAAQMD Regulations 1-522 and 1-523 for the reporting period are summarized below	522 and 1-523 for the reporting period are summa	rised below:
Started Stopped	Abatement Emission Source (S#) Device (A#) Point (P#)	CEM GLM Gas Parametri NOx SO2 CO H2S TRS NH3 O2 CO2 H20 LTA Lead Steam Flow Wind Dir. Speed pH Temp. VOC. Press.
6/2/2017 2:51 PM 6/7/2017 10:50 AM Strovered On: 6/5/2017	36051	
Event Description: UPDATE (RCA#07D56): Resumption of Monitoring; repairs were completed and the hydrocarbon analyzer returned to service on 67/17 at 1050 hours.	oring; repairs were completed and the hydrocarbon analy:	ser returned to service on 6/7/17 at 1050 hours.
The Alky Cooling Water Tower hydrocarbon ana	alyzer (12AI1400) went inoperative on 6/2/17 at 1451 ho	The Alky Cooling Water Tower hydrocarbon analyzer (12AII400) went inoperative on 6/2/17 at 1451 hours. Incident is ongoing. Notification of resumption of monitoring will be submitted once repairs are complete.
6/5/2017 1:26 AM 6/6/2017 7:10 AM	S4039	
Event Description: The F-3560 fuel gas flow meter was inoperative from 6/5/17 at 0126 hours to 6/6/17 at 071	from 6/5/17 at 0126 hours to 6/6/17 at 0710 hours.	
6/22/2017 8:32 AM 6/23/2017 3:44 PM	84342	
Event Description: On June 22, 2017 at 0832 hours F-1551 Nox analyzer became inoperative. Analyzer repai	nalyzer became inoperative. Analyzer repaired and back i	red and back in service on June 23, 2017 at 1544 hours.
6/30/2017 11:29 AM 7/1/2017 11:32 PM S RLW S	RLW RLW O became increasitive on 6/30/2017 of 1120 beams Analy	
and the second s	y, occanic insperative on 0/30/2017 at 1127 flours. Aliany	zer repaired aino back ill service on 7/1/2017 at 1552 trouts.
7/3/2017 8:25 AM 7/5/2017 7:49 AM Discovered On: 7/5/2017 7:49 AM	S4171	
Exem Description: The F-353-301 west NOX analyzer became inoperative on 7/3/11 at 0823 mours; the analyzer was returned to service on 7/5/2017 at 0/49 hours.	crative on 7/3/17 at 0825 hours, the analyzer was returne	d to service on 1/5/2017 at 0/49 hours.
7/8/2017 10:51 AM 7/9/2017 2:21 PM 🗷	RLW	
Event Description: Long Wharf parametric analyzer 20T1019 went inoperative on 7/8/2017 at 1051 hours. Analyzer repaired and back in service on 7/9/2017 at 1421 hours.	noperative on 7/8/2017 at 1051 hours. Analyzer repaired	and back in service on 7/9/2017 at 1421 hours.



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Started Stopped	Abatement E Source (S#) Device (A#) P.	Emission Fuel Wind Ox SO2 CO H2S TRS NH3 O2 CO2 H2O LTA Lead Steam Flow Wind Dir. Speed nH Temp. VOC. Pros	Gauge Press.
7/27/2017 9:10 AM 7/28/2017 10:29 AM G S6013 Discovered On: 7/31/2017 Event Description: The NISO flare sample station became inoperative on 7/27/17 at 0910 hours. The monitor came back into service on 7/28/17 at 1029 hours.	\$6013 ive on 7/27/17 at 0910 hours. The monitor ca	ne back into service on 7/28/17 at 1029 hours .	
Discovered On: 8/8/2017 Event Description: RESUMPTION OF MONITORING: REFERENCE RCA # 07E08 The FCC O2 analyzer passed its CGA with a linearity error criteria of <15% on of August 10, 2017 at 0822 hours. FCC O7 analyzer is incorrective as of August 2, 2017 at 1351 hours. The Cylinder Gas Audit (FCA) performed to	NCE RCA # 07E08 learlty error criteria of <15% on of August 10	72017 RESUMPTION OF MONITORING: REFERENCE RCA # 07E08 The FCC O2 analyzer passed its CGA with a linearity error criteria of <15% on of August 10, 2017 at 0822 hours. FCC O2 analyzer is inconstruing as of August 10, 2017 at 1351 hours. The Culinder Gas Audit (FCA) merformed on Aurus 2, 2017 did not most the linearity as of August 2, 2017 at 1351 hours.	
8/13/2017 8:00 AM 8/14/2017 8:30 AM	S4228		
Discovered On: 8/14/2017 Event Description: The SRU #2 SO2 analyzer went inoperative on 8/	8/13/17 at approximately 0800 hours. Repairs	Discovered On: 8/14/2017 Event Description: The SRU #2 SO2 analyzer went inoperative on 8/13/17 at approximately 0800 hours. Repairs were made and the analyzer had a successful calibration on 08/14/17 at 0830 hours.	
8/19/2017 4:00 AM 8/21/2017 7:46 AM SQ1/2017 8/21/2017 7:46 AM	S4171		
Event Description: On August 19, 2017 at 0400 hours F355 360 W C	CO failed calibration. On Monday August 21	Event Description: On August 19, 2017 at 0400 hours F355 360 W CO failed calibration. On Monday August 21, 2017 at 0746 hours the monitor was calibrated and resumed operation.	
9/4/2017 3:58 AM 9/5/2017 12:41 PM	84159		
Inscovered Un: 3/5/2017 Event Description: The F-410/420 Nox analyzer failed calibration 9/4/17 at 0358 hours. The Nox analyzer returned to service 9/5/17 at 1241 hours	9/4/17 at 0358 hours. The Nox analyzer return	ed to service 9/5/17 at 1241 hours	
9/7/2017 6:47 PM 9/9/2017 8:00 AM	S4341		
processes on 30,001. Event Description: The F-1361 O2 analyzer became inoperative on 09/07/17 at 1847 hours. The O2 analyzer		was repaired and returned to service on 09/09/17 at 0800 hours.	
9/30/2017 3:58 PM 10/2/2017 12:06 PM	84229		
Inscription: 10/2/2017 Event Description: The SRU #3 O2 analyzer went inoperative on 9/3	30/17 at approximately 1558 hours. Repairs	Inscrience on: 10/2/2017 Event Description: The SRU #3 O2 analyzer went inoperative on 9/30/17 at approximately 1558 hours. Repairs were made and the analyzer had a successful calibration on 10/2/17 at 1206 hours.	
10/13/2017 5:35 AM 10/14/2017 7:00 AM	S4285		
	3/13/17 at 0535 hours; the V-65 O2 analyzer	was returned to service on 10/14/17 at 0700 hours.	
10/22/2017 10:17 AM 10/23/2017 3:11 PM	S4171		
٠ ا	October 22, 2017 at 1017 hours. The monito	F355 360 E Nox monitor became inoperative on October 22, 2017 at 1017 hours. The monitor was repaired and back in service on October 23, 2017 at 1511 hours.	
10/23/2017 1:00 PM 10/23/2017 2:00 PM 🗷	84229		
Event Description: On October 23 2017, for the 1300 clock hour the SRU 3 S02 emissions monitor indicated	e SRU 3 S02 emissions monitor indicated an	an excess of it's 250 ppm SO2 limit.	



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Started	Stopped			Source (S#)	Abatement Device (A#)	Emission Point (P#)	CEM GLM Gas Parametri NOx SO2 CO H2S TRS NH3 O2 CO2 H2O LTA Lead Steam Flow Wind Dir. Speed pH	Wind Gauge Dir. Speed pH Temp. VOC. Press.
10/27/2017 4:23 PM 10 Discovered On: 10/30/2017 Event Description:	10/29/2017 7:34 AM 2017	7:34 AM	S	\$6016				
Upc The	date Regarding	RCA# 07F15 : Re	epairs were co	Update Regarding RCA# 07F15 : Repairs were complete and FCC flare flow meter was re The FCC Flare flow meter became inoperative on 10/27/17 at 1623 hours and is currently	re flow meter was rours and is currently		Update Regarding RCA# 07F15 : Repairs were complete and FCC flare flow meter was returned to service on 10/29/2017 at 0734 hours The FCC Flare flow meter became inoperative on 10/27/17 at 1623 hours and is currently ongoing. Resumption of monitoring to follow when repairs are complete	
10/28/2017 10:48 PM 11. **Discovered On: 10/30/2017 Event Description: The FCC service .	11/9/2017 2017 e FCC Flare sam vice on 11/9/201	A 11/9/2017 2:00 PM 30/2017 The FCC Flare sample station becamservice on 11/9/2017 at 1400 hours.	▼ re inoperative	S6016 : on 10/28/17 at 2248	8 hours and is curre	ntly ongoing. Th	M 11/9/2017 2:00 PM G Se016 C C C C C C C C C C C C C C C C C C C	nplete. The monitor returned to
11/4/2017 6:08 AM 1 Discovered On: 11/6/2017 Event Description: The F-	11/6/2017 017 : F-710 O2 moni	3:17 PM itor became inope	rative on Nov	S4167 vember 4, 2017 at 06	508 hours. The mon	itor was repaired	M 11/6/2017 3:17 PM G S4/67 C	
11/4/2017 6:20 AM 11/6/2017 10:10 AM States States Discovered On: 11/6/2017 Event Description: The F-410/420 O2 monitor became inoperative on November 4, 2017 at 0620 hours. The	11/6/2017 017 F-410/420 O2 1	10:10 AM monitor became i	✓ Inoperative on	S4159	at 0620 hours. The	monitor was rep	✓ ✓	
11/20/2017 5:30 AM 11/21/2017 Discovered On: 11/21/2017 Event Description: On November 20,	11/21/2017 2017 November 20, 2	8:37 AM 2017 Cogeneration	☑ n Train 2000	S4352 CO monitor became	inoperative at 0530) hours. The mor	11/20/2017 5:30 AM 8:37 AM S4352 S4352 </td <td></td>	
11/28/2017 6:03 AM 11/30/2017 10:54 AM 🖃 V-870 Discovered On: 11/29/2017 Event Description: UPDATE to RCA#07F51: Repairs were completed and the V-870 BTU analyzer returned	11/30/2017 2017 DATE to RCA#(10:54 AM #07F51: Repairs w	vere completed	v-870 d and the V-870 BTV	U analyzer returned		to service on 11/30/17 at 1054 hours.	
1016/2017 1:58 PM 12. **Discovered On: 12/16/2017 Event Description: The F41	V-8/0 B 1 U and 12/18/2017 (2017 F410/447 NOx	3:14 PM monitor became	operative on r	Ine V-8/U B I U analyzer became inoperative on November 28, 2017 at 0003 hours. M 12/18/2017 3:14 PM		he monitor was r	✓ ✓	
12/21/2017 5:54 AM 12 Discovered On: 12/22/2017 Event Description: The Gol	12/22/2017 1:45 PM 1017 Golden Gate GLM H2S	1:45 PM LM H2S analyzer	▼	GG H2S ative on December 2	!1, 2017 at 0554 ho	urs. Repairs wer	M 12/22/2017 1:45 PM GG GG H28 analyzer went inoperative on December 21, 2017 at 0554 hours. Repairs were made and the analyzer returned to service on December 22, 2017 at 1345 hours.	

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Gauge	Temp. VOC. Press.
Wind	ead Steam Flow Wind Dir. Speed pH
Opacity/	arametri NOx SO2 CO H2S TRS NH3 O2 CO2 H2O LTA L
Fucl	CEM GLM Gas P
Emission	Point (P#)
Abatement	Device (A#)
	Source (S#)
	Stopped
	Started

Certification Statement

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the supercents and information in this document and in all attachments and offer materials are true, accurate, and complete.

General Manager Richmond Refinery Kory Judd
Print Name

Signature of Responsible Official

Title

Wednesday, January 24, 2018

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